State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

RE: PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
LICKING COUNTY
Application No: 01-7485

DATE: August 11, 1999

Label Graphix, Inc
Curt Prokash
1720 James Parkway
Heath, OH 43056

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
DAPC, CDO

Facility ID: 0145010375

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: August 11, 1999**
Terms and Conditions	**Effective Date: August 11, 1999**

ADMINISTRATIVE MODIFICATION PERMIT TO INSTALL 01-7485

Application Number:	01-7485
APS Premise Number:	0145010375
Permit Fee:	**$1000**
Name of Facility:	Label Graphix, Inc
Person to Contact:	Curt Prokash
Address:	1720 James Parkway Heath, OH 43056

Location of proposed air contaminant source(s) [emissions unit(s)]:
1720 James Parkway
Heath, **Ohio**

Description of proposed emissions unit(s):
SEVEN FLEXOGRAPHIC PRINTING PRESSES.

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

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 Related to Monitoring and Recordkeeping 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 quarterly, i.e., 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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) 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
Organic Compounds	59.10

Part II: Special Terms and Conditions

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
650 Webtron **5**-color, 6 1/2" flexographic printing press #1	OAC rule 3745-31-05	The volatile organic compounds emissions shall not exceed 3 lbs per hour and 6.6 tons per year.
	OAC rule 3745-21-09(Y)(2)(b)	Exempt from the requirements of OAC rule 3745-21-09(Y)(1), maximum usage of coatings and inks less than or equal to one hundred forty-eight tons per year for all printing presses.

2. Additional Terms and Conditions

None.

B. Operational Restrictions

The maximum usage of coatings and inks must be less than or equal to one hundred and forty-eight tons per year for all printing presses, K001 - K007.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that list the following information for this printing press:

   a. company identification for each ink, varnish and clean-up material;
   b. number of gallons of each ink, varnish and clean-up material employed;
   c. density of each ink and varnish employed;
   d. organic compound content of each ink, varnish and clean-up material, in pounds per

gallon;

e. total organic compound emissions rate for each ink, varnish and clean-up material, in pound(s) per day;
f. total number of hours the emissions unit was in operation; and,
g. average hourly organic compound emissions rate for each ink, varnish and clean-up material, i.e., (d)/(e), in pounds per hour (average).

[Note: The ink, varnish and cleaning material information must be for the ink, varnish and clean-up material as employed, including any thinning solvents added at the emissions unit.]

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information within 30 days of occurrence:

   a. exceedance of the hundred and forty-eight tons per year usage limit for inks and coatings in all printing presses;

   b. the permittee shall also submit an annual report which specifies the total organic compound emissions from K001 for the previous calendar year. These reports shall be submitted by January 31 of each year; and,

   c. deviation reports shall include any corrective or preventive measures taken.

   All reports are to be submitted to the Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

E. Testing Requirements

1. Compliance with the emission limitation(s) contained in this permit shall be determined in accordance with the following method(s):

   a. Emission Limitation

      3.00 pounds per hour OC, 6.60 ton per year for K001

      Applicable Compliance Method

      For K001, compliance shall be determined by daily recordkeeping of ink and coating usage

and organic compound content of each ink or coating. Formulation data or USEPA 24A (for flexographic printing inks and related coatings) shall be used to determine the organic compound contents of the inks or coatings.

Applicable Compliance Method (annual rate)

Multiply the average hourly rate (quantified in Section B.1.f. of Recordkeeping Requirements) by the number of hours per year and divide by 2000 to convert to tons.

b. Emission Limitation

148 tons per year of inks and coatings

Applicable Compliance Method

For K001, multiply the daily usage of inks and coatings by the product density and divide by 2000 to convert to tons.

F. Miscellaneous Requirements

None

Part II: Special Terms and Conditions

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
650 Webtron **5**-color, 6 1/2" flexographic printing press #2	OAC rule 3745-31-05	The volatile organic compounds emissions shall not exceed 3 lbs per hour and 6.6 tons per year.
	OAC rule 3745-21-09(Y)(2)(b)	Exempt from the requirements of OAC rule 3745-21-09(Y)(1), maximum usage of coatings and inks less than or equal to one hundred forty-eight tons per year for all printing presses.

2. Additional Terms and Conditions

None.

B. Operational Restrictions

The maximum usage of coatings and inks must be less than or equal to one hundred and forty-eight tons per year for all printing presses, K001 - K007.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that list the following information for this printing press:

a. company identification for each ink, varnish and clean-up material;
b. number of gallons of each ink, varnish and clean-up material employed;
c. density of each ink and varnish employed;
d. organic compound content of each ink, varnish and clean-up material, in pounds per gallon;

e. total organic compound emissions rate for each ink, varnish and clean-up material, in pound(s) per day;

f. total number of hours the emissions unit was in operation; and,

g. average hourly organic compound emissions rate for each ink, varnish and clean-up material, i.e., (d)/(e), in pounds per hour (average).

[Note: The ink, varnish and cleaning material information must be for the ink, varnish and clean-up material as employed, including any thinning solvents added at the emissions unit.]

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information within 30 days of occurrence:

   a. exceedance of the hundred and forty-eight tons per year usage limit for inks and coatings in all printing presses;

   b. the permittee shall also submit an annual report which specifies the total organic compound emissions from K002 for the previous calendar year. These reports shall be submitted by January 31 of each year; and,

   c. deviation reports shall include any corrective or preventive measures taken.

   All reports are to be submitted to the Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

E. Testing Requirements

1. Compliance with the emission limitation(s) contained in this permit shall be determined in accordance with the following method(s):

   a. Emission Limitation

      3.00 pounds per hour OC, 6.60 ton per year for K002

      Applicable Compliance Method

      For K002, compliance shall be determined by daily recordkeeping of ink and coating usage and organic compound content of each ink or coating. Formulation data or USEPA 24A (for flexographic printing inks and related coatings) shall be used to determine the organic

compound contents of the inks or coatings.

Applicable Compliance Method (annual rate)

Multiply the average hourly rate (quantified in Section B.1.f. of Recordkeeping Requirements) by the number of hours per year and divide by 2000 to convert to tons.

b. Emission Limitation

148 tons per year of inks and coatings

Applicable Compliance Method

For K002, multiply the daily usage of inks and coatings by the product density and divide by 2000 to convert to tons.

F. Miscellaneous Requirements

None.

Part II: Special Terms and Conditions

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
2200 Mark Andy 10-color, 10" flexographic printing press #3	OAC rule 3745-31-05	The volatile organic compounds emissions shall not exceed 4.4 lbs per hour and 9.6 tons per year.
	OAC rule 3745-21-09(Y)(2)(b)	Exempt from the requirements of OAC rule 3745-21-09(Y)(1), maximum usage of coatings and inks less than or equal to one hundred forty-eight tons per year for all printing presses.

2. Additional Terms and Conditions

None.

B. Operational Restrictions

The maximum usage of coatings and inks must be less than or equal to one hundred and forty-eight tons per year for all printing presses, K001 - K007.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that list the following information for this printing press:

   a. company identification for each ink, varnish and clean-up material;

b. number of gallons of each ink, varnish and clean-up material employed;
c. density of each ink and varnish employed;
d. organic compound content of each ink, varnish and clean-up material, in pounds per gallon;
e. total organic compound emissions rate for each ink, varnish and clean-up material, in pound(s) per day;

f. total number of hours the emissions unit was in operation; and,

g. average hourly organic compound emissions rate for each ink, varnish and clean-up material, i.e., (d)/(e), in pounds per hour (average).

[Note: The ink, varnish and cleaning material information must be for the ink, varnish and clean-up material as employed, including any thinning solvents added at the emissions unit.]

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information within 30 days of occurrence:

   a. exceedance of the hundred and forty-eight tons per year usage limit for inks and coatings in all printing presses;

   b. the permittee shall also submit an annual report which specifies the total organic compound emissions from K003 for the previous calendar year. These reports shall be submitted by January 31 of each year; and,

   c. deviation reports shall include any corrective or preventive measures taken.

   All reports are to be submitted to the Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

E. Testing Requirements

1. Compliance with the emission limitation(s) contained in this permit shall be determined in accordance with the following method(s):

   a. Emission Limitation

      4.40 pounds per hour OC, 9.60 tons per year for K003

      Applicable Compliance Method

      For K003, compliance shall be determined by daily recordkeeping of ink and coating usage and organic compound content of each ink or coating. Formulation data or USEPA 24A (for flexographic printing inks and related coatings) shall be used to determine the organic compound contents of the inks or coatings.

Applicable Compliance Method (annual rate)

Multiply the average hourly rate (quantified in Section B.1.f. of Recordkeeping Requirements) by the number of hours per year and divide by 2000 to convert to tons.

b. Emission Limitation

148 tons per year of inks and coatings

Applicable Compliance Method

For K003, multiply the daily usage of inks and coatings by the product density and divide by 2000 to convert to tons.

F. Miscellaneous Requirements

None.

Part II: Special Terms and Conditions

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
4120 Mark Andy 7-color, 10" flexographic printing press #4	OAC rule 3745-31-05	The volatile organic compounds emissions shall not exceed 4.4 lbs per hour and 9.6 tons per year.
	OAC rule 3745-21-09(Y)(2)(b)	Exempt from the requirements of OAC rule 3745-21-09(Y)(1), maximum usage of coatings and inks less than or equal to one hundred forty-eight tons per year for all printing presses.

2. Additional Terms and Conditions

None.

B. Operational Restrictions

The maximum usage of coatings and inks must be less than or equal to one hundred and forty-eight tons per year for all printing presses, K001 - K007.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that list the following information for this printing press:

   a. company identification for each ink, varnish and clean-up material;

b. number of gallons of each ink, varnish and clean-up material employed;
c. density of each ink and varnish employed;
d. organic compound content of each ink, varnish and clean-up material, in pounds per gallon;
e. total organic compound emissions rate for each ink, varnish and clean-up material, in pound(s) per day;
f. total number of hours the emissions unit was in operation; and,

g. average hourly organic compound emissions rate for each ink, varnish and clean-up material, i.e., (d)/(e), in pounds per hour (average).

[Note: The ink, varnish and cleaning material information must be for the ink, varnish and clean-up material as employed, including any thinning solvents added at the emissions unit.]

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information within 30 days of occurrence:

   a. exceedance of the hundred and forty-eight tons per year usage limit for inks and coatings in all printing presses;

   b. the permittee shall also submit an annual report which specifies the total organic compound emissions from K004 for the previous calendar year. These reports shall be submitted by January 31 of each year; and,

   c. deviation reports shall include any corrective of preventive measures taken.

   All reports are to be submitted to the Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

E. Testing Requirements

1. Compliance with the emission limitation(s) contained in this permit shall be determined in accordance with the following method(s):

   a. Emission Limitation

      4.40 pounds per hour OC, 9.60 ton per year for K004

      Applicable Compliance Method

      For K004, compliance shall be determined by daily recordkeeping of ink and coating usage and organic compound content of each ink or coating. Formulation data or USEPA 24A (for flexographic printing inks and related coatings) shall be used to determine the organic compound contents of the inks or coatings.

Applicable Compliance Method (annual rate)

Multiply the average hourly rate (quantified in Section B.1.f. of Recordkeeping Requirements) by the number of hours per year and divide by 2000 to convert to tons.

b. Emission Limitation

148 tons per year of inks and coatings

Applicable Compliance Method

For K004, multiply the daily usage of inks and coatings by the product density and divide by 2000 to convert to tons.

F. Miscellaneous Requirements

None

Part II: Special Terms and Conditions

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
750 Webtron 7-color, 71/2" flexographic printing press #5	OAC rule 3745-31-05	The volatile organic compounds emissions shall not exceed 3.4 lbs per hour and 7.5 tons per year.
	OAC rule 3745-21-09(Y)(2)(b)	Exempt from the requirements of OAC rule 3745-21-09(Y)(1), maximum usage of coatings and inks less than or equal to one hundred forty-eight tons per year for all printing presses.

2. Additional Terms and Conditions

None.

B. Operational Restrictions

The maximum usage of coatings and inks must be less than or equal to one hundred and forty-eight tons per year for all printing presses, K001 - K007.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that list the following information for this printing press:

   a. company identification for each ink, varnish and clean-up material;

b. number of gallons of each ink, varnish and clean-up material employed;
c. density of each ink and varnish employed;
d. organic compound content of each ink, varnish and clean-up material, in pounds per gallon;
e. total organic compound emissions rate for each ink, varnish and clean-up material, in pound(s) per day;

f. total number of hours the emissions unit was in operation; and,

g. average hourly organic compound emissions rate for each ink, varnish and clean-up material, i.e., (d)/(e), in pounds per hour (average).

[Note: The ink, varnish and cleaning material information must be for the ink, varnish and clean-up material as employed, including any thinning solvents added at the emissions unit.]

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information within 30 days of occurrence:

   a. exceedance of the hundred and forty-eight tons per year usage limit for inks and coatings in all printing presses;

   b. the permittee shall also submit an annual report which specifies the total organic compound emissions from K005 for the previous calendar year. These reports shall be submitted by January 31 of each year; and,

   c. deviation reports shall include any preventive or corrective measures taken.

   All reports are to be submitted to the Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

E. Testing Requirements

1. Compliance with the emission limitation(s) contained in this permit shall be determined in accordance with the following method(s):

   a. Emission Limitation

      3.40 pounds per hour OC, 7.50 ton per year for K005

      Applicable Compliance Method

      For K005, compliance shall be determined by daily recordkeeping of ink and coating usage and organic compound content of each ink or coating. Formulation data or USEPA 24A (for flexographic printing inks and related coatings) shall be used to determine the organic compound contents of the inks or coatings.

Applicable Compliance Method (annual rate)

Multiply the average hourly rate (quantified in Section B.1.f. of Recordkeeping Requirements) by the number of hours per year and divide by 2000 to convert to tons.

b. Emission Limitation

148 tons per year of inks and coatings

Applicable Compliance Method

For K005, multiply the daily usage of inks and coatings by the product density and divide by 2000 to convert to tons.

F. Miscellaneous Requirements

None

Part II: Special Terms and Conditions

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
2200 Mark Andy 8-color, 10" flexographic printing press #6	OAC rule 3745-31-05	The volatile organic compounds emissions shall not exceed 4.4 lbs per hour and 9.6 tons per year.
	OAC rule 3745-21-09(Y)(2)(b)	Exempt from the requirements of OAC rule 3745-21-09(Y)(1), maximum usage of coatings and inks less than or equal to one hundred forty-eight tons per year for all printing presses.

2. Additional Terms and Conditions

None.

B. Operational Restrictions

The maximum usage of coatings and inks must be less than or equal to one hundred and forty-eight tons per year for all printing presses, K001 - K007.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that list the following information for this printing press:

   a. company identification for each ink, varnish and clean-up material;

b. number of gallons of each ink, varnish and clean-up material employed;

c. density of each ink and varnish employed;

d. organic compound content of each ink, varnish and clean-up material, in pounds per gallon;

e. total organic compound emissions rate for each ink, varnish and clean-up material, in pound(s) per day;

f. total number of hours the emissions unit was in operation; and,

g. average hourly organic compound emissions rate for each ink, varnish and clean-up material, i.e., (d)/(e), in pounds per hour (average).

[Note: The ink, varnish and cleaning material information must be for the ink, varnish and clean-up material as employed, including any thinning solvents added at the emissions unit.]

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information within 30 days of occurrence:

   a. exceedance of the hundred and forty-eight tons per year usage limit for inks and coatings in all printing presses;

   b. the permittee shall also submit an annual report which specifies the total organic compound emissions from K006 for the previous calendar year. These reports shall be submitted by January 31 of each year; and,

   c. deviation reports shall include any preventive or corrective measures taken.

   All reports are to be submitted to the Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

E. Testing Requirements

1. Compliance with the emission limitation(s) contained in this permit shall be determined in accordance with the following method(s):

   a. Emission Limitation

      4.40 pounds per hour OC, 9.60 ton per year for K006

      Applicable Compliance Method

      For K006, compliance shall be determined by daily recordkeeping of ink and coating usage and organic compound content of each ink or coating. Formulation data or USEPA 24A (for flexographic printing inks and related coatings) shall be used to determine the organic compound contents of the inks or coatings.

Applicable Compliance Method (annual rate)

Multiply the average hourly rate (quantified in Section B.1.f. of Recordkeeping Requirements) by the number of hours per year and divide by 2000 to convert to tons.

b. Emission Limitation

148 tons per year of inks and coatings

Applicable Compliance Method

For K006, multiply the daily usage of inks and coatings by the product density and divide by 2000 to convert to tons.

F. Miscellaneous Requirements

None

Part II: Special Terms and Conditions

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
2200 Mark Andy ***10***-color, 10" flexographic printing press #7	OAC rule 3745-31-05	The volatile organic compounds emissions shall not exceed 4.4 lbs per hour and 9.6 tons per year.
	OAC rule 3745-21-09(Y)(2)(b)	Exempt from the requirements of OAC rule 3745-21-09(Y)(1), maximum usage of coatings and inks less than or equal to one hundred forty-eight tons per year for all printing presses.

2. Additional Terms and Conditions

None.

B. Operational Restrictions

The maximum usage of coatings and inks must be less than or equal to one hundred and forty-eight tons per year for all printing presses, K001 - K007.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that list the following information for this printing press:

   a. company identification for each ink, varnish and clean-up material;

b. number of gallons of each ink, varnish and clean-up material employed;

c. density of each ink and varnish employed;

d. organic compound content of each ink, varnish and clean-up material, in pounds per gallon;

e. total organic compound emissions rate for each ink, varnish and clean-up material, in pound(s) per day;

f. total number of hours the emissions unit was in operation; and,

g. average hourly organic compound emissions rate for each ink, varnish and clean-up material, i.e., (d)/(e), in pounds per hour (average).

[Note: The ink, varnish and cleaning material information must be for the ink, varnish and clean-up material as employed, including any thinning solvents added at the emissions unit.]

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information within 30 days of occurrence:

   a. exceedance of the hundred and forty-eight tons per year usage limit for inks and coatings in all printing presses;

   b. the permittee shall also submit an annual report which specifies the total organic compound emissions from K007 for the previous calendar year. These reports shall be submitted by January 31 of each year; and,

   c. deviation reports shall include any preventive or corrective measures taken.

   All reports are to be submitted to the Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

E. Testing Requirements

1. Compliance with the emission limitation(s) contained in this permit shall be determined in accordance with the following method(s):

   a. Emission Limitation

      4.40 pounds per hour OC, 9.6 ton per year for K007

Applicable Compliance Method

For K007, compliance shall be determined by daily recordkeeping of ink and coating usage and organic compound content of each ink or coating. Formulation data or USEPA 24A (for flexographic printing inks and related coatings) shall be used to determine the organic compound contents of the inks or coatings.

Applicable Compliance Method (annual rate)

Multiply the average hourly rate (quantified in Section B.1.f. of Recordkeeping Requirements) by the number of hours per year and divide by 2000 to convert to tons.

b. Emission Limitation

148 tons per year of inks and coatings

Applicable Compliance Method

For K007, multiply the daily usage of inks and coatings by the product density and divide by 2000 to convert to tons.

F. Miscellaneous Requirements

None