John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

11/7/2012

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Automated Packaging Systems
Facility ID: 1318226136
Permit Type: Renewal
Permit Number: P0095422

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Cleveland Division of Air Quality

PROPOSED

Division of Air Pollution Control
Title V Permit
for
Automated Packaging Systems

Facility ID:	1318226136
Permit Number:	P0095422
Permit Type:	Renewal
Issued:	11/7/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Automated Packaging Systems

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Authorization

Facility ID:	1318226136
Facility Description:	Printed polyethylene film
Application Number(s):	A0026987, A0037652
Permit Number:	P0095422
Permit Description:	Title V renewal permit for flexographic presses for the printing of inks on polyethylene film controlled by a thermal incinerator. The polyethylene film is made on site. The original PTI 13-0817 was issued on 10/3/85.
Permit Type:	Renewal
Issue Date:	11/7/2012
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance

Superseded Permit Number: P0095421

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

Automated Packaging Systems
Automated Packaging Systems, Inc.
13555 McCracken Road
Garfield Heights, OH 44125

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

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

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

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

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

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Cleveland Division of Air Quality.

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

3. Scheduled Maintenance

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

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

4. Risk Management Plans

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

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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

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

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

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

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

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

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

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

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

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

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

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

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

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

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

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

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

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

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

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

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

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

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

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

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

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

23. Title VI Provisions

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

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

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

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

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

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

The permittee shall submit required reports in the following manner:

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

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

25. Records Retention RequirementsUnder State Law Only

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

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of

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

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

27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

   a) None.

2. Facility-Wide Emissions Limitations and Monitoring Requirements

   a) Applicable Emissions Limitations and/or Control Requirements

      (1) Emissions from this facility shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(a) Synthetic Minor to avoid MACT PTI 13-04751 issued 8/8/2008	9.9 tons of any single hazardous air pollutant as a rolling, 12-month summation for the entire facility. 24.0 tons of combined hazardous air pollutants as a rolling, 12-month summation for the entire facility.
b.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See c)(2), c)(3), c)(4), d)(3), and d)(4) below.

      (2) Additional Terms and Conditions

         a. None.

   b) Operational Restrictions

      (1) The maximum annual HAP material usage limitations for emissions units controlled by the thermal oxidizers at the facility shall not exceed those specified by the formula listed below, based on a rolling 12-month summation.

$$\sum_{i=1}^{n} VOLi * Di * \%HAPi * \left(\frac{ton}{2000\ lbs}\right) * (1 - CE * DE) = \text{Ehap}$$

Where:
n = number of coatings/cleanup materials employed
VOLi= volume usage of coating/cleanup material i, gallons/month
D_i = Density of material i, pounds/gal
%HAPi = percent by weight of the single or total HAP in material i
CE = capture efficiency by weight
DE = destruction efficiency by weight
Ehap = HAP emissions in tons/month

The permittee shall document the monthly HAP material usage by tracking the monthly coating and cleanup material usage for each press at the facility with the density of each material, the HAP content, the emission capture efficiency by weight, and the emission control efficiency by weight, to calculate total monthly actual HAP emissions generated by emissions units controlled by the thermal oxidizers. For emissions units that are not controlled by the thermal oxidizer, track the monthly material usage with the density and HAP content.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 13-04751]

(2) The maximum annual HAP material usage rates* (from coatings and cleanup) for the facility shall not exceed 9.9 tons per year of any single HAP and 24 tons per year of combined HAPs, based on a rolling, 12-month basis.

<u>Single HAP material usage:</u>
Current month use (in tons) + previous 11 months use (in tons) ≤ 9.9 tons of single HAP

<u>Combined HAPs material usage:</u>
Current month use (in tons) + previous 11 months use (in tons) ≤ 24.0 tons of combined HAPs.

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the HAP material used is emitted.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 13-04751]

c) Facility Monitoring and/or Record Keeping Requirements:

(1) The permittee shall maintain monthly records of the following information for all emissions units at the facility:

a. the single and combined HAP material usage rate for each month; and

b. the rolling, 12-month summation of the single and combined HAP material usage rates.

(2) The permittee shall keep and maintain monthly records of single HAP material usage and combined HAPs material usage for all emissions units at the facility on a rolling 12-month basis.

<u>Single HAP material usage:</u>
Current month use (in tons) + previous 11 months use (in tons) = Total 12-month tons of single HAP

<u>Combined HAPs material usage:</u>
Current month use (in tons) + previous 11 months use (in tons) = Total 12-month tons of combined HAPs.

These records, as well as any supporting analyses and computations, shall be retained in the company's files (on site) for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-04751]

(3) The CAM plan for emissions units K002, K005-K007 has been developed for VOC emissions. The CAM performance indicator for VOC emissions is the temperature monitoring for the thermal incinerator control equipment.

The CAM performance indicator device to continuously monitor the combustion temperature within the thermal incinerator when the emissions units are in operation is specified in Section C term c)(1) for each emissions unit. When the monitoring requirements are outside of any parameters specified in Section C terms c)(1) and d)(1) for K002, K005, K006, and K007, and Section C terms c)(1) and d)(2) for K014, K015, and K016, corrective action (including, but not limited to, an evaluation of the emissions unit and the control device) will be required.

Upon detecting an excursion of any of the VOC emission indicator parameters listed above, the owner or operator shall restore operation of the emissions unit (including the control devices) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

If a determination is made by the Administrator of Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

d) Facility Reporting Requirements:

(1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the usage of any individual HAP exceeded 9.9 tons, as a rolling 12-month summation, and the actual individual HAP usage for each such month.

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

(2) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the total usage of combined HAPs exceeded 24.0 tons, as a rolling 12-month summation, and the actual total combined HAPs usage for each such month.

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

(3) If the results of the monitoring or record keeping data for the incinerator temperature indicate that the VOC emission limitations may have been exceeded, the permittee shall submit the results of that data, and document any corrective action taken to restore operation of the emissions unit, or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The reports shall be submitted in accordance with the Standard Terms and Conditions of this Permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Facility Testing Requirements:

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in 3.a) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>
This facility shall not emit more than 9.9 tons per rolling, 12-month period of each single hazardous air pollutant (HAP), including materials used for emissions units other than printing and publishing.

<u>Applicable Compliance Method:</u>
Compliance shall be demonstrated based upon the record keeping requirements specified in 3.c)(1) above.

b. <u>Emission Limitation:</u>
This facility shall not emit more than 24.0 tons per rolling, 12-month period of total combined HAPs, including materials used for emissions units other than printing and publishing.

<u>Applicable Compliance Method:</u>
Compliance shall be demonstrated based upon the record keeping requirements specified in 3.c)(1) above.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-04751]

C. Emissions Unit Terms and Conditions

1. K014, Press #9

Operations, Property and/or Equipment Description:

6-color flexographic printing press #9 for printing on polyethylene film with drying oven and two RTOs acting in tandem.

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

(1) d)(5), d)(6), d)(7), and d)(8)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(a) (PTI 13-03562 issued 2/4/03)	Volatile organic compound (VOC) emissions, including emissions from cleanup materials, shall not exceed 31.85 pounds per hour. VOC emissions shall not exceed 28.8 tons per year (TPY) as a rolling, 12-month summation. See b)(2)a. below.
b.	OAC rule 3745-21-09(Y)(1)(b)	The capture and control efficiency limitations specified by this rule are less stringent than the capture and control efficiency limitations established pursuant to OAC rule 3745-31-05(A)(3).
c.	40 CFR Part 64 (CAM)	See Section B. and c)(1), d)(2), d(3), and e.(2) below.

(2) Additional Terms and Conditions

a. The permittee shall maintain and operate two regenerative thermal oxidizers (RTO) operating in tandem as follows:

i. employ a capture system which shall capture not less than 80%, by weight, of all VOC emissions from this emission unit; and

ii. employ a control system which shall control not less than 90%, by weight, of the VOC emissions captured.

c) Operational Restrictions

(1) The average temperature of the exhaust gases from each thermal incinerator in operation, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 64, and PTI 13-03562]

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Modification Permit to Install #13-3562, issued on February 4, 2003: d)(2), d)(3), and d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal incinerator in operation when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64, and PTI 13-03562]

(3) The permittee shall collect and record the following information for each day this emissions unit is in operation:

a. a log of downtime for the capture system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. the average temperature of the exhaust gases from each thermal incinerator in operation during each 3- hour block of time during the day.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64, and PTI 13-03562]

(4) The permittee shall collect and record the following information on a monthly basis:

a. the number of gallons of each coating and ink employed;

b. the VOC content of each coating and ink employed, in pounds per gallon;

c. the total uncontrolled VOC emissions from all coatings and inks employed, calculated as the sum of (a)x(b) for all coatings and inks employed, in pounds;

d. the number of gallons of each cleanup material employed;

e. the VOC content of each cleanup material employed, in pounds per gallon;

f. the total uncontrolled VOC emissions from all cleanup materials employed, calculated as the sum of (d)x(e) for all cleanup materials employed, in pounds;

g. the total uncontrolled VOC emissions from all coatings, inks, and cleanup materials employed, calculated as the sum of (c) and (f), in pounds;

h. the total controlled (stack) VOC emissions from all coatings, inks, and cleanup materials employed, in pounds, calculated as (g) x (1-X), where "X" is the overall control efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance;

i. the number of hours the emissions unit was in operation;

j. the average hourly VOC emission rate calculated as (h)/(i), in pounds per hour;

k. the total controlled VOC emissions from all coatings, inks, and cleanup materials, in tons per month, calculated as the sum of the values in d)(4)h.; and

l. the rolling, 12-month VOC emissions in tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-03562]

(5) Air Toxic Policy Clarifying Language

The permit to install for this emissions unit (K014) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Propylene Glycol Monomethyl Ether (PGME)
TLV (ug/m^3): 368,596
Maximum Hourly Emission Rate (pounds/hour): 31.85
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 352
MAGLC (ug/m^3): 8,776

[Authority for term: OAC rule 3745-114-01, OAC rule 3745-77-07(C)(1) and PTI 13-03562]

(6) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

[Authority for term: OAC rule 3745-114-01, OAC rule 3745-77-07(C)(1) and PTI 13-03562]

(7) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01, and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

[Authority for term: OAC rule 3745-114-01, OAC rule 3745-77-07(C)(1) and PTI 13-03562]

(8) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Authority for term: OAC rule 3745-114-01, OAC rule 3745-77-07(C)(1) and PTI 13-03562]

e) Reporting Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Modification Permit to Install #13-3562, issued on February 4, 2003: e)(2) and e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average temperature of the exhaust gases from each thermal incinerator did not comply with the temperature limitation specified above.

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

[Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv), 40 CFR Part 64 and PTI 13-03562]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the average hourly emissions and/or the rolling, 12-month VOC emissions exceeded the limits in b)(1)a.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv) and PTI 13-03562]

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

[Authority for term: OAC rule 3745-77-07(A)(3)(c) and PTI 13-03562]

f) Testing Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Modification Permit to Install #13-3562, issued on February 4, 2003: f)(2), f)(3), and f)(4). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these

requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

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

a. Emission Limitation:
VOC emissions shall not exceed 31.85 pounds per hour.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the test methods and procedures specified in f)(3) and the record keeping requirements specified in d)(4).

b. Emission Limitation:
VOC emissions shall not exceed 28.8 tons per year (TPY) as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-03562]

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC, and the capture and control efficiency limitations for VOC. The emission testing shall also be conducted to establish the average temperature within the thermal oxidizer.

c. The following test methods shall be employed to demonstrate compliance with the overall emission control efficiency limitation for VOC:

i. U.S. EPA Method 25 in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are 50 ppm or greater; or

ii. U.S. EPA Method 25A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are less than 50 ppm.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality (Cleveland DAQ).

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

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

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Cleveland DAQ's refusal to accept the results of the emission tests.

h. Personnel from the Cleveland DAQ shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-03562]

(4) USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings.

USEPA Method 24 (40 CFR Part 60, Appendix A) or formulation data shall be used to determine the VOC contents of the cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-03562]

g) Miscellaneous Requirements

(1) None.

2. K015

Operations, Property and/or Equipment Description:

6-color flexographic printing press #10 for printing on polyethylene film with drying oven and two RTOs acting in tandem.

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

(1) d)(6), d)(7), d)(8), and d)(9)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 13-04751 issued 8/8/2008)	Volatile Organic Compound (VOC) emissions shall not exceed 6.9 lbs/hr (stack). See b)(2)a. below. VOC emissions shall not 17.28 lbs/hr (fugitive). See b)(2)a. below.
b.	OAC rule 3745-31-05(D)(1)(a) (Synthetic Minor to avoid Nonattainment New Source Review)	VOC emissions shall not exceed 34.26 tons per year as a rolling, 12- month summation. See c)(3) below.
c.	OAC rule 3745-21-09 (Y)(1)(b)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 64 (CAM)	See section B. and c)(1), d)(2), d)(3), and e)(2) below.

(2) Additional Terms and Conditions

a. The permittee shall maintain and operate two regenerative thermal oxidizers (RTO) operating in tandem as follows:

i. employ a capture system which shall capture not less than 80%, by weight, of all VOC emissions from this emission unit; and

ii. employ a control system which shall control not less than 90%, by weight, of the VOC emissions captured.

c) Operational Restrictions

(1) The average temperature of the exhaust gases from each thermal incinerator in operation, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64]

(2) The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 13-04751]

(3) The maximum annual VOC material usage rates* (from coatings and cleanup) for this emissions unit shall not exceed 34.26 tons VOC per year, based upon a rolling, 12-month summation of the VOC material usage figures.

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the VOC material used is emitted.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 13-04751]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emission unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-04751]

(2) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired temperature. The temperature monitor and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64, and PTI 13-04751]

(3) The permittee, having chosen to demonstrate compliance with the capture and control efficiency or overall control efficiency requirements through the use of a thermal incinerator, shall collect and record the following information each day for the control equipment:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64, and PTI 13-04751]

(4) The permittee shall collect and record the following information monthly for the purpose of determining annual VOC emissions:

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 number of gallons of each coating employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

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

g. the total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons; and

h. the calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons determined in accordance with f)(1)c. (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-04751]

(5) The permittee shall collect and record the total VOC, emissions from all coatings and clean up materials employed, in tons, calculated from the monthly records in d)(4) above, for this emissions unit for the purpose of determining annual VOC emissions based on a rolling, 12-month summation of emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-04751]

(6) The permit to install for this emissions unit K015 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The Ohio EPA's "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as

described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\frac{TLV}{10} * \frac{8}{X} * \frac{5}{Y} = 4\frac{TLV}{XY} = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

   Pollutant: Ethanol
   TLV (mg/m3): 1,844
   Maximum Hourly Emission Rate (lbs/hr): 7.21
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 103.1
   MAGLC (ug/m3): 44,863.18

   Pollutant: Heptane
   TLV (mg/m3): 1,639.26
   Maximum Hourly Emission Rate (lbs/hr): 5.64
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 80.65
   MAGLC (ug/m3): 39,030.09

Pollutant: 2-Propanol
TLV (mg/m3): 491.53
Maximum Hourly Emission Rate (lbs/hr): 0.4
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5.72
MAGLC (ug/m3): 11,703.18

Pollutant: Propyl Acetate
TLV (mg/m3): 835.42
Maximum Hourly Emission Rate (lbs/hr): 1.16
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 16.59
MAGLC (ug/m3): 19,890.93

Pollutant: N-Propanol
TLV (mg/m3): 491.53
Maximum Hourly Emission Rate (lbs/hr): 9.41
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 134.42
MAGLC (ug/m3): 11,703.18

The permittee, has demonstrated that emissions of toxic contaminants from emissions units are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03(F).

[Authority for term: OAC rule 3745-114-01, OAC rule 3745-77-07(C)(1) and PTI 13-04751]

(7) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC

3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous permitted level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[Authority for term: OAC rule 3745-114-01, OAC rule 3745-77-07(C)(1) and PTI 13-04751]

(8) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[Authority for term: OAC rule 3745-114-01, OAC rule 3745-77-07(C)(1) and PTI 13-04751]

(9) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for term: OAC rule 3745-114-01, OAC rule 3745-77-07(C)(1) and PTI 13-04751]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports to the Cleveland Division of Air Quality (Cleveland DAQ) that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv) and PTI 13-04751]

(2) The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

[Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv), 40 CFR Part 64, and PTI 13-04751]

(3) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv) and PTI 13-04751]

(4) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC. These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(A)(3)(c) and PTI 13-04751]

f) Testing Requirements

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

a. Emission Limitation:
6.9 lbs VOC/hr (stack)

Applicable Compliance Method:
Compliance shall be determined using Method 25 or 25A from 40 CFR Part 60. See f)(2) below.

b. Emission Limitation:
17.26 lbs VOC/hr (fugitive)

Applicable Compliance Method:
Compliance shall be determined using Method 204A from 40 CFR Part 60. See f)(2) below.

c. Emission limitation:
34.26 Tons VOC per rolling, 12 month period

Applicable Compliance Method:
Compliance shall be determined by calculating the monthly and rolling 12-month emissions using the amount of coatings used and cleanup materials employed using the following equation to determine monthly emissions:

$\sum_{i=1}^{n} VOLi * VOCi * \left(\frac{ton}{2000\ lbs}\right) * (1 - CE * DE)$ = Evoc

Where:
n = number of coatings/cleanup materials employed
VOLi = volume usage of coating/cleanup material i, gallons/month
VOCi = organic material content of coating/cleanup material i, pounds VOC/gal
CE = capture efficiency by weight (as determined from the most recent performance test)
DE = destruction efficiency by weight (as determined from the most recent performance test)
Evoc = VOC emissions in tons/month

U.S. EPA Method 24 and 24A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings as received from the manufacturer or supplier.

d. Emission Limitation:
Minimum VOC emission capture efficiency of 80%, by weight

Applicable Compliance Method:
Compliance shall be determined through performance testing using U.S. EPA Methods 204 through 204F from 40 CFR Part 51, Appendix M in accordance with OAC rule 3745-21-10(C). See f)(2) below.

e. Emission Limitation:
Minimum VOC emission destruction efficiency of 90%, by weight.

Applicable Compliance Method:
Performance testing using U.S. EPA Method 25 or 25A in accordance with OAC rule 3745-21-10 (C). See f)(2) below.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-04751]

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC, and the capture and control efficiency limitations for VOC. The emission testing shall also be conducted to establish the average temperature within the thermal oxidizer.

c. The following test methods shall be employed to demonstrate compliance with the overall emission control efficiency limitation for VOC:

i. U.S. EPA Method 25 in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are 50 ppm or greater; or

ii. U.S. EPA Method 25A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are less than 50 ppm.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality (Cleveland DAQ).

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

f. The emission control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-

21-10 (C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Cleveland DAQ's refusal to accept the results of the emission tests.

h. Personnel from the Cleveland DAQ shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-04751]

g) Miscellaneous Requirements

(1) None.

3. K016, Soloflex #2

Operations, Property and/or Equipment Description:

6-color flexographic printing press #2 for printing on polyethylene film with drying oven and two RTOs acting in tandem.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 13-04026 issued 3/13/03)	Volatile organic compound (VOC) emissions, including emissions from cleanup materials, shall not exceed: 5.0 pounds VOC per hour (stack); and 12.46 pounds VOC per hour (fugitive). See b)(2)a. below.
b.	OAC rule 3745-31-05(D)(1)(a) (Synthetic minor to avoid Prevention of Significant Deterioration)	34.26 TPY VOC per rolling, 12-month period including emissions from cleanup materials
c.	OAC rule 3745-21-09(Y)(1)(b)	The capture and control efficiency limitations specified by this rule are less stringent than the capture and control efficiency limitations established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 64 (CAM)	See Section B. and c)(1), d)(2), d)(3), and e)(2) below.

(2) Additional Terms and Conditions

a. The permittee shall maintain and operate two regenerative thermal oxidizers (RTO) operating in tandem as follows:

i. employ a capture system which shall capture not less than 80%, by weight, of all VOC emissions from this emission unit; and

ii. employ a control system which shall control not less than 90%, by weight, of the VOC emissions captured.

c) Operational Restrictions

(1) The average temperature of the exhaust gases from each thermal incinerator in operation, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64]

(2) The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 13-04026]

(3) The maximum annual VOC material usage rates* (from coatings and cleanup) for this emissions unit shall not exceed 34.26 tons VOC per year, based upon a rolling, 12-month summation of the VOC material usage figures.

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the VOC material used is emitted.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 13-04026]

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #13-4026, issued on March 13, 2003: d)(2), d)(3), and d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC Rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal incinerator in operation when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64, and PTI 13-04026]

(3) The permittee shall collect and record the following information for each day this emissions unit is in operation:

a. a log of downtime for the capture system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. the average temperature of the exhaust gases from each thermal incinerator in operation during each 3-hour block of time during the day.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64, and PTI 13-04026]

(4) The permittee shall collect and record the following information for each month the emissions unit is in operation:

a. the operating hours for each month; and

b. the rolling, 12-month summation of the operating hours.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-04026]

(5) The permittee shall collect and record the following information on a monthly basis:

a. the name and identification of coatings and clean-up;

b. the number of gallons of each coating and ink employed;

c. the VOC content of each coating and ink employed, in pounds per gallon;

d. the total uncontrolled VOC emissions from all coatings and inks employed, calculated as the sum of (a)x(b) for all coatings and inks employed, in pounds;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material employed, in pounds per gallon;

g. the total uncontrolled VOC emissions from all cleanup materials employed, calculated as the sum of (d)x(e) for all cleanup materials employed, in pounds;

h. the total uncontrolled VOC emissions from all coatings, inks, and cleanup materials employed, calculated as the sum of (c) and (f), in pounds;

i. the total controlled (stack) VOC emissions from all coatings, inks, and cleanup materials employed, in pounds, calculated as (g) x (1-X) x (Y), where "X" is the control (destruction) efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance and "Y" is the capture efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance;

j. the total fugitive VOC emissions from all coatings, inks, and cleanup materials employed, in pounds, calculated as (g)x(1-Y) where "Y" is the capture efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance;

k. the number of hours the emissions unit was in operation;

l. the average hourly controlled VOC emission rate, in pounds per hour, calculated as (h)/(j);

m. the average hourly fugitive VOC emission rate, in pounds per hour, calculated as (i)/(j);

n. the total controlled VOC emissions from all coatings, inks, and cleanup materials, in tons per month, calculated as the sum of the values in d)(4)h. and d)(4)i. divided by 2000; and

o. the rolling, 12-month VOC emissions in tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-04026]

(6) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #13-4026, issued on March 13, 2003: e)(2) and e)(4). The reporting requirements contained in the above referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC Rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average temperature of the exhaust gases from each thermal incinerator did not comply with the temperature limitation specified above.

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

[Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv), 40 CFR Part 64, and PTI 13-04026]

(3) The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ that identify each month during which the average hourly controlled (stack) VOC emission rate exceeded the limit in b)(1)a.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv) and PTI 13-04026]

(4) The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ that identify each month during which the average hourly fugitive VOC emission rate exceeded the limit in b)(1)a.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv) and PTI 13-04026]

(5) The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ that identify each month during which the rolling, 12-month VOC emissions from K016 exceeded the limit in b)(1)b.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv) and PTI 13-04026]

(6) The permittee shall submit deviation (excursion) reports to the Cleveland DAQ that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(A)(3)(c) and PTI 13-04026]

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

[Authority for term: OAC rule 3745-77-07(A)(3)(c) and PTI 13-04026]

f) Testing Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #13-4026, issued on March 13, 2003: f)(2). The testing requirements contained in the above referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

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

a. <u>Emissions Limitation:</u>
5.0 lbs/hr VOC stack emissions

<u>Applicable Compliance Method:</u>
Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3)k and the stack testing identified in f)(3).

b. Emission Limitation:
12.46 lbs/hr VOC fugitive emissions

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3)l and the stack testing identified in f)(3).

c. Emission Limitation:
34.26 TPY VOC per rolling, 12-month period

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3)n.

d. Emissions Limitation:
Minimum VOC emission capture efficiency of 80%, by weight and minimum VOC emission destruction efficiency of 90%, by weight.

Applicable Compliance Method:
Performance testing in accordance with OAC rule 3745-21-10(C).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-04026]

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC, and the capture and control efficiency limitations for VOC. The emission testing shall also be conducted to establish the average temperature within the thermal oxidizer.

c. The following test methods shall be employed to demonstrate compliance with the overall emission control efficiency limitation for VOC:

i. U.S. EPA Method 25 in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are 50 ppm or greater; or

ii. U.S. EPA Method 25A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are less than 50 ppm.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality (Cleveland DAQ).

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

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

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Cleveland DAQ's refusal to accept the results of the emission tests.

h. Personnel from the Cleveland DAQ shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-04026]

(4) USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings and inks.

USEPA Method 24 (40 CFR Part 60, Appendix A) or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

(1) None

4. Emissions Unit Group -6-Color Presses: K002, K005, K006, K007,

EU ID	Operations, Property and/or Equipment Description
K002	6-color flexographic printing press #3 for printing on polyethylene film with drying oven and two RTOs acting in tandem.
K005	6-color flexographic printing press #6 for printing on polyethylene film with drying oven and two RTOs acting in tandem.
K006	6-color flexographic printing press #7 for printing on polyethylene film with drying oven and two RTOs acting in tandem.
K007	6-color flexographic printing press #8 for printing on polyethylene film with drying oven and two RTOs acting in tandem

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Admin Mod PTI P0110155 issued 8/27/2012.)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D)(1)(b) and OAC rule 3745-21-09(Y)(1)(b).
b.	OAC rule 3745-31-05(D)(1)(a)	Volatile organic compound (VOC) emissions, including emissions from cleanup materials, from emissions units K002, K005, K006, and K007, combined, shall not exceed 92 tons per year (TPY).
c.	OAC rule 3745-21-09(Y)(1)(b)	See b)(2)a. below.
d.	40 CFR Part 64 (CAM)	See Section B. and c)(1), d)(1), d)(2), and e)(1) below.

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with a capture and associated VOC control system which is designed and operated to achieve the following efficiencies:

i. a capture efficiency which is at least 65% by weight; and

ii. a control efficiency which is at least 90% by weight..

c) Operational Restrictions

(1) The average temperature of the exhaust gases from each thermal incinerator in operation, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 64, and PTI P0110155]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal incinerator in operation when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device(s) shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64, and PTI P0110155]

(2) The permittee shall collect and record the following information for K002, K005, K006 and K007 individually, for each day the emissions unit is in operation:

a. a log of downtime for the capture system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. the average temperature of the exhaust gases from each thermal incinerator in operation during each 3-hour block of time during the day.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64, and PTI P0110155]

(3) The permittee shall collect and record the following information on an annual basis for emissions units K002, K005, K006, and K007, combined:

a. the number of gallons of each coating and ink employed;

b. the VOC content of each coating and ink employed, in pounds per gallon;

c. the total uncontrolled VOC emissions from all coatings and inks employed, calculated as the sum of (a)x(b) for all coatings and inks employed, in pounds and tons;

d. the number of gallons of each cleanup material employed;

e. the VOC content of each cleanup material employed, in pounds per gallon;

f. the total uncontrolled VOC emissions from all cleanup materials employed, calculated as the sum of (d)x(e) for all cleanup materials employed, in pounds and tons;

g. the total uncontrolled VOC emissions from all coatings, inks, and cleanup materials employed, calculated as the sum of (c) and (f), in tons; and

h. the total controlled VOC emissions from all coatings, inks, and cleanup materials employed, in tons, calculated as (g) x (1-*X*) where "*X*" is the overall control efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110155]

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average temperature of the exhaust gases from the thermal incinerators did not comply with the temperature limitation specified above.

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

[Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv), 40 CFR Part 64, and PTI P0110155]

(2) The permittee shall submit annual reports that specify the total emissions of VOC from emissions units K002, K005, K006, and K007 combined for the previous calendar year. The reports shall be submitted by April 15 of each year through the submittal of the annual fee emissions report.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>
VOC emissions from emissions units K002, K005, K006, and K007, combined, shall not exceed 92 tpy.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110155]

(2) USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings.

(3) USEPA Method 24 (40 CFR Part 60, Appendix A) or formulation data shall be used to determine the VOC contents of the cleanup materials.

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable capture and control efficiency limitations for VOC. The emission testing shall also be conducted to establish the average temperature within the thermal oxidizer.

c. The following test methods shall be employed to demonstrate compliance with the overall emission control efficiency limitation for VOC:

i. U.S. EPA Method 25 in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are 50 ppm or greater; or

ii. U.S. EPA Method 25A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are less than 50 ppm.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality (Cleveland DAQ).

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

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

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Cleveland DAQ's refusal to accept the results of the emission tests.

h. Personnel from the Cleveland DAQ shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110155]

g) Miscellaneous Requirements

(1) None.