☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install: **03-17431**

A. Source Description

This permit is for 6 existing flexographic printing presses (K006, K008, K005, K004 and K010), 2 new flexographic printing presses (K011 and K012), one new scrap processing system (R003), new forming machines (R002), the existing plate making operations(P001) and the gluing machines(R001).

B. Facility Emissions and Attainment Status

This facility is potentially major for Title V for VOC and HAP emissions. Field Container Company, L.P. is located in Marion County which is in attainment for all pollutants.

C. Source Emissions

The facility has requested synthetic minor limitations to avoid Title V. The facility has requested a 86.47 tons per year combined limitation for all of the flexographic printing presses (K006, K008, K005, K004, K010, K011 and K012). Federally enforceable material usage restrictions for all processes included in this permit will be employed to meet VOC synthetic minor limitations. The facility has also requested a Hazardous Air Pollutants (HAPs) limitation of less than 9.9 tons per rolling, 12-month period for any individual HAP and less than 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K006, K008, K005, K004, K010, K011, K012, R001 and R002. In addition, the facility has requested a federally enforceable restriction on the annual hours of operation for emissions unit's R001 and R002 of 2080 hours per year.

D. Conclusion

With the material usage restrictions, the HAP limitations and the hours of operation limitation, the facility will not be applicable to the Title V program.

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
MARION COUNTY

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

Application No: 03-17431
Fac ID: 0351010062

DATE: 5/8/2008

Field Container Company, LP-Marion Div.
Kimberly Peterson
1500 Nicholas Boulevard
Elk Grove Village, IL 60007

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$1600** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NWDO**

MARION COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **03-17431** FOR AN AIR CONTAMINANT SOURCE
FOR **Field Container Company, LP-Marion Div.**

On 5/8/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Field Container Company, LP-Marion Div.**, located at **1171 West Center Street, Marion**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17431:

Installation of new printing/packaging operations and modifications to existing ones.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]

DRAFT PERMIT TO INSTALL 03-17431

Application Number:	03-17431
Facility ID:	0351010062
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Field Container Company, LP-Marion Div.
Person to Contact:	Kimberly Peterson
Address:	1500 Nicholas Boulevard Elk Grove Village, IL 60007

Location of proposed air contaminant source(s) [emissions unit(s)]:
1171 West Center Street
Marion, Ohio

Description of proposed emissions unit(s):
Installation of new printing/packaging operations and modifications to existing ones.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

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

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	92.38
PE	0.79
Individual HAPs	9.9
Combined HAPs	24.9

Emissions Unit ID: **K004**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K004) - Flexographic Printing Press 5.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	6.05 lbs volatile organic compounds (VOC)/hr from coatings and inks. See A.2.a.
OAC rule 3745-31-05(C)	86.47 tons VOC per rolling, 12-month period (for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined) See A.2.b. 9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002 combined. See A.2.c.
OAC rule 3745-21-09(Y)(1)(a)(i)	See A.2.d.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(Y)(1)(a)(i).

2.b The emissions of VOCs from emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed 86.47 tons per year based on a rolling 12-month summation of the monthly emissions. The federally enforceable VOC limitation is based on maximum material usage restrictions (see B.1 and B.2) and is being established for the purposes of avoiding Title V

applicability.

2.c HAP emissions from emissions units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.1	10.4
1-6	5.0	12.5
1-7	5.8	14.5
1-8	6.6	16.6
1-9	7.4	18.7
1-10	8.3	20.8
1-11	9.1	22.8
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

2.d The volatile organic compound (VOC) content of any coating and/or ink employed flexographically in this emissions unit shall not exceed the following limitation:

i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied; or

ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink, as applied.

B. Operational Restrictions

1. The maximum annual usage for VOC containing material for emission units K004, K005, K006, K008, K009, K010, K011 and K012, combined shall not exceed the following, based upon a rolling, 12-month summation of the material usage figures:

   a. 1,089,115 pounds for inks; and

   b. 4,291,330 pounds for coatings.

   To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Material Usage

Month(s)	Inks (lbs)	Coatings (lbs)
1-1	90759	357610
1-2	181518	715221
1-3	272277	1072831
1-4	363036	1430441
1-5	453795	1788051
1-6	544554	2145661
1-7	635314	2503271
1-8	726074	2860882
1-9	816835	3218496
1-10	907595	3576107
1-11	998356	3933720
1-12	1089115	4291330

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual material usage limitation shall be based upon a rolling, 12-month summation of the monthly material usage rates.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for inks and coatings for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined:

a. The name and identification number of each coating/ink employed.

b. The VOC content of each coating/ink, in percent VOC by volume of the coating/ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for C VOC,5].

c. The VOC content of each coating/ink, in pounds/pounds of ink, as applied.

d. The number of pounds of each coating/ink employed.

e. The total VOC emissions from each coating/ink employed, in pounds or tons ("c" x "d").

f. The total VOC emissions from all the coatings/inks employed, in pounds or tons (summation of "e").

g. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined:

a. For the first 12 months of operation following the issuance of this permit, the cumulative monthly material usage rates for the following, in pounds:

i. inks; and

ii. coatings.

b. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly inks and coatings usage rates, in pounds.

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined:

a. The company identification of each ink and coating employed.

b. The weight percent of each HAP in each, ink and coating, as applied.

c. The amount of each, ink and coating employed, in pounds.

d. The emission rate, in pounds, for each HAP from each ink and coating employed ("b" x "c").

e. The total emission rate for each HAP from all inks and coatings employed (summation of "d" for each HAP for all coatings and inks), in pounds per month.

f. The total HAP emission rate for the combination of all HAPs from all inks and coatings employed (summation of "e" for all HAPs), in pounds per month.

g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combined HAPs, in tons per month.

h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combined HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings/inks (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation of 86.47 tons.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons of and 24.9 tons, respectively (from emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined).

4. The permittee shall submit quarterly deviation (excursion) reports that identify all

exceedances of the following material usage limitations specified in section B.1:

After the first 12 calendar months of operation following issuance of this permit, all exceedances of the following maximum rolling, 12-month material usage limitations :

i. For inks: 1,089,115 pounds; and

ii. For coatings: 4,291,330.

5. These quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

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

a. Emission Limitation: 6.05 lbs VOC/hr, from coatings and inks

Applicable Compliance Method: The hourly VOC emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was determined (as demonstrated below) by multiplying the maximum material paperboard processing rate and a maximum VOC content:

(38.1 lbs/hr)(0.08)= 3.05 lbs VOC/hr inks

(150.0 lbs/hr)(0.02)= 3.00 lbs/hr coatings

b. Emission Limitation: 86.47 tons VOC per rolling, 12-month period, for emissions unit's K004, K005, K006, K008, K009, K010, K011 and K012, combined.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.1 and C.2 of this permit.

c. Emission Limitation: 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for combined HAPs, for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002,

combined.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.3 of this permit..

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

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Issued: To be entered upon final issuance
PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K005) - Flexographic Printing Press 3.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	3.30 lbs volatile organic compounds (VOC)/hr from coatings and inks. See A.2.a.
OAC rule 3745-31-05(C)	86.47 tons VOC per rolling, 12-month period (for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined) See A.2.b. 9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002 combined. See A.2.c.
OAC rule 3745-21-09(Y)(1)(a)(i)	See A.2.d.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(Y)(1)(a)(i).

2.b The emissions of VOCs from emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed 86.47 tons per year based on a rolling 12-month summation of the monthly emissions. The federally enforceable VOC limitation is based on maximum material usage restrictions

(see B.1 and B.2) and is being established for the purposes of avoiding Title V applicability.

2.c HAP emissions from emissions units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.1	10.4
1-6	5.0	12.5
1-7	5.8	14.5
1-8	6.6	16.6
1-9	7.4	18.7
1-10	8.3	20.8
1-11	9.1	22.8
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

2.d The volatile organic compound (VOC) content of any coating and/or ink employed flexographically in this emissions unit shall not exceed the following limitation:

i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied; or

ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink, as applied.

B. Operational Restrictions

1. The maximum annual usage for VOC containing material for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed the following, based upon a rolling, 12-month summation of the material usage figures:

   a. 1,089,115 pounds for inks; and

   b. 4,291,330 pounds for coatings.

   To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Material Usage

Month(s)	Inks (lbs)	Coatings (lbs)
1-1	90759	357610
1-2	181518	715221
1-3	272277	1072831
1-4	363036	1430441
1-5	453795	1788051
1-6	544554	2145661
1-7	635314	2503271
1-8	726074	2860882
1-9	816835	3218496
1-10	907595	3576107
1-11	998356	3933720
1-12	1089115	4291330

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual material usage limitation shall be based upon a rolling, 12-month summation of the monthly material usage rates.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for inks and

coatings for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined:

a. The name and identification number of each coating/ink employed.

b. The VOC content of each coating/ink, in percent VOC by volume of the coating/ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for C VOC,5].

c. The VOC content of each coating/ink, in pounds/pounds of ink, as applied.

d. The number of pounds of each coating/ink employed.

e. The total VOC emissions from each coating/ink employed, in pounds or tons ("c" x "d").

f. The total VOC emissions from all the coatings/inks employed, in pounds or tons (summation of "e").

g. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined:

a. For the first 12 months of operation following the issuance of this permit, the cumulative monthly material usage rates for the following, in pounds:

i. inks; and

ii. coatings.

b. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly inks and coatings usage rates, in pounds.

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined:

a. The company identification of each ink and coating employed.

b. The weight percent of each HAP in each, ink and coating, as applied.

c. The amount of each, ink and coating employed, in pounds.

d. The emission rate, in pounds, for each HAP from each ink and coating employed ("b" x "c").

e. The total emission rate for each HAP from all inks and coatings employed (summation of "d" for each HAP for all coatings and inks), in pounds per month.

f. The total HAP emission rate for the combination of all HAPs from all inks and coatings employed (summation of "e" for all HAPs), in pounds per month.

g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combined HAPs, in tons per month.

h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combined HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings/inks (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation of 86.47 tons.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons of and 24.9 tons, respectively (from emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined).

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following material usage limitations specified in section B.1:

   After the first 12 calendar months of operation following issuance of this permit, all exceedances of the following maximum rolling, 12-month material usage limitations :

   i. For inks: 1,089,115 pounds; and

   ii. For coatings: 4,291,330.

5. These quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

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

   a. Emission Limitation: 3.30 lbs VOC/hr, from coatings and inks

      Applicable Compliance Method: The hourly VOC emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

      *The potential to emit for this emissions unit was determined (as demonstrated below) by multiplying the maximum material paperboard processing rate and a maximum VOC content:

      (20.8 lbs/hr)(0.08)= 1.66 lbs VOC/hr inks

      (81.8 lbs/hr)(0.02)= 1.64 lbs/hr coatings

   b. Emission Limitation: 86.47 tons VOC per rolling, 12-month period, for emissions unit's K004, K005, K006, K008, K009, K010, K011 and K012, combined.

      Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.1 and C.2 of this permit.

   c. Emission Limitation: 9.9 tons per rolling, 12-month period for any individual HAP

and 24.9 tons per rolling, 12-month period for combined HAPs, for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.3 of this permit..

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

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Emissions Unit ID: **K006**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K006) - Flexographic Printing Press 1.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	3.52 lbs volatile organic compounds (VOC)/hr from coatings and inks. See A.2.a.
OAC rule 3745-31-05(C)	86.47 tons VOC per rolling, 12-month period (for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined) See A.2.b. 9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002 combined. See A.2.c.
OAC rule 3745-21-09(Y)(1)(a)(i)	See A.2.d.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(Y)(1)(a)(i).

2.b The emissions of VOCs from emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed 86.47 tons per year based on a rolling 12-month summation of the monthly emissions. The federally enforceable VOC limitation is based on maximum material usage restrictions (see B.1 and B.2) and is being established for the purposes of avoiding Title V

applicability.

2.c HAP emissions from emissions units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.1	10.4
1-6	5.0	12.5
1-7	5.8	14.5
1-8	6.6	16.6
1-9	7.4	18.7
1-10	8.3	20.8
1-11	9.1	22.8
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

2.d The volatile organic compound (VOC) content of any coating and/or ink employed flexographically in this emissions unit shall not exceed the following limitation:

i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied; or

ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink,

as applied.

B. Operational Restrictions

1. The maximum annual usage for VOC containing material for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed the following, based upon a rolling, 12-month summation of the material usage figures:

   a. 1,089,115 pounds for inks; and

   b. 4,291,330 pounds for coatings.

   To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Material Usage

Month(s)	Inks (lbs)	Coatings (lbs)
1-1	90759	357610
1-2	181518	715221
1-3	272277	1072831
1-4	363036	1430441
1-5	453795	1788051
1-6	544554	2145661
1-7	635314	2503271
1-8	726074	2860882
1-9	816835	3218496
1-10	907595	3576107
1-11	998356	3933720
1-12	1089115	4291330

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual material usage limitation shall be based upon a rolling, 12-month summation of the monthly material usage rates.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for inks and coatings for emissions units K004, K005, K006, K008, K009, K010, K011 and K012,

combined:

a. The name and identification number of each coating/ink employed.

b. The VOC content of each coating/ink, in percent VOC by volume of the coating/ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for C VOC,5].

c. The VOC content of each coating/ink, in pounds/pounds of ink, as applied.

d. The number of pounds of each coating/ink employed.

e. The total VOC emissions from each coating/ink employed, in pounds or tons ("c" x "d").

f. The total VOC emissions from all the coatings/inks employed, in pounds or tons (summation of "e").

g. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined:

a. For the first 12 months of operation following the issuance of this permit, the cumulative monthly material usage rates for the following, in pounds:

i. inks; and

ii. coatings.

b. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly inks and coatings usage rates, in pounds.

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined:

a. The company identification of each ink and coating employed.

b. The weight percent of each HAP in each, ink and coating, as applied.

c. The amount of each, ink and coating employed, in pounds.

d. The emission rate, in pounds, for each HAP from each ink and coating employed ("b" x "c").

e. The total emission rate for each HAP from all inks and coatings employed (summation of "d" for each HAP for all coatings and inks), in pounds per month.

f. The total HAP emission rate for the combination of all HAPs from all inks and coatings employed (summation of "e" for all HAPs), in pounds per month.

g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combined HAPs, in tons per month.

h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combined HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings/inks (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation of 86.47 tons.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons of and 24.9 tons, respectively (from emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined).

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following material usage limitations specified in section B.1:

   After the first 12 calendar months of operation following issuance of this permit, all exceedances of the following maximum rolling, 12-month material usage limitations :

   i. For inks: 1,089,115 pounds; and

   ii. For coatings: 4,291,330.

5. These quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

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

   a. Emission Limitation: 3.52 lbs VOC/hr, from coatings and inks

      Applicable Compliance Method: The hourly VOC emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

      *The potential to emit for this emissions unit was determined (as demonstrated below) by multiplying the maximum material paperboard processing rate and a maximum VOC content:

      (22.2 lbs/hr)(0.08)= 1.77 lbs VOC/hr inks

      (87.3 lbs/hr)(0.02)= 1.75 lbs/hr coatings

   b. Emission Limitation: 86.47 tons VOC per rolling, 12-month period, for emissions unit's K004, K005, K006, K008, K009, K010, K011 and K012, combined.

      Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.1 and C.2 of this permit.

   c. Emission Limitation: 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for combined HAPs, for emission

units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.3 of this permit..

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

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Emissions Unit ID: **K008**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K008) - Flexographic Printing Press 2.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	2.42 lbs volatile organic compounds (VOC)/hr from coatings and inks. See A.2.a.
OAC rule 3745-31-05(C)	86.47 tons VOC per rolling, 12-month period (for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined) See A.2.b. 9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002 combined. See A.2.c.
OAC rule 3745-21-09(Y)(1)(a)(i)	See A.2.d.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(Y)(1)(a)(i).

2.b The emissions of VOCs from emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed 86.47 tons per year based on a rolling 12-month summation of the monthly emissions. The federally enforceable VOC limitation is based on maximum material usage restrictions (see B.1 and B.2) and is being established for the purposes of avoiding Title V

applicability.

2.c HAP emissions from emissions units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.1	10.4
1-6	5.0	12.5
1-7	5.8	14.5
1-8	6.6	16.6
1-9	7.4	18.7
1-10	8.3	20.8
1-11	9.1	22.8
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

2.d The volatile organic compound (VOC) content of any coating and/or ink employed flexographically in this emissions unit shall not exceed the following limitation:

i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied; or

ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink,

B. Operational Restrictions

1. The maximum annual usage for VOC containing material for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed the following, based upon a rolling, 12-month summation of the material usage figures:

   a. 1,089,115 pounds for inks; and

   b. 4,291,330 pounds for coatings.

   To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Material Usage

Month(s)	Inks (lbs)	Coatings (lbs)
1-1	90759	357610
1-2	181518	715221
1-3	272277	1072831
1-4	363036	1430441
1-5	453795	1788051
1-6	544554	2145661
1-7	635314	2503271
1-8	726074	2860882
1-9	816835	3218496
1-10	907595	3576107
1-11	998356	3933720
1-12	1089115	4291330

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual material usage limitation shall be based upon a rolling, 12-month summation of the monthly material usage rates.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for inks and coatings for emissions units K004, K005, K006, K008, K009, K010, K011 and K012,

combined:

a. The name and identification number of each coating/ink employed.

b. The VOC content of each coating/ink, in percent VOC by volume of the coating/ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for C VOC,5].

c. The VOC content of each coating/ink, in pounds/pounds of ink, as applied.

d. The number of pounds of each coating/ink employed.

e. The total VOC emissions from each coating/ink employed, in pounds or tons ("c" x "d").

f. The total VOC emissions from all the coatings/inks employed, in pounds or tons (summation of "e").

g. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined:

a. For the first 12 months of operation following the issuance of this permit, the cumulative monthly material usage rates for the following, in pounds:

i. inks; and

ii. coatings.

b. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly inks and coatings usage rates, in pounds.

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined:

a. The company identification of each ink and coating employed.

b. The weight percent of each HAP in each, ink and coating, as applied.

c. The amount of each, ink and coating employed, in pounds.

d. The emission rate, in pounds, for each HAP from each ink and coating employed ("b" x "c").

e. The total emission rate for each HAP from all inks and coatings employed (summation of "d" for each HAP for all coatings and inks), in pounds per month.

f. The total HAP emission rate for the combination of all HAPs from all inks and coatings employed (summation of "e" for all HAPs), in pounds per month.

g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combined HAPs, in tons per month.

h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combined HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings/inks (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation of 86.47 tons.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons of and 24.9 tons, respectively (from emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined).

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following material usage limitations specified in section B.1:

   After the first 12 calendar months of operation following issuance of this permit, all exceedances of the following maximum rolling, 12-month material usage limitations :

   i. For inks: 1,089,115 pounds; and

   ii. For coatings: 4,291,330.

5. These quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

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

   a. Emission Limitation: 2.42 lbs VOC/hr, from coatings and inks

      Applicable Compliance Method: The hourly VOC emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

      *The potential to emit for this emissions unit was determined (as demonstrated below) by multiplying the maximum material paperboard processing rate and a maximum VOC content:

      (15.2 lbs/hr)(0.08)= 1.22 lbs VOC/hr inks

      (60.0 lbs/hr)(0.02)= 1.20 lbs/hr coatings

   b. Emission Limitation: 86.47 tons VOC per rolling, 12-month period, for emissions unit's K004, K005, K006, K008, K009, K010, K011 and K012, combined.

      Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.1 and C.2 of this permit.

   c. Emission Limitation: 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for combined HAPs, for emission

units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.3 of this permit..

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

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Issued: To be entered upon final issuance
PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K009) - Flexographic Printing Press 4.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	3.30 lbs volatile organic compounds (VOC)/hr from coatings and inks. See A.2.a.
OAC rule 3745-31-05(C)	86.47 tons VOC per rolling, 12-month period (for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined) See A.2.b. 9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002 combined. See A.2.c.
OAC rule 3745-21-09(Y)(1)(a)(i)	See A.2.d.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(Y)(1)(a)(i).

2.b The emissions of VOCs from emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed 86.47 tons per year based on a rolling 12-month summation of the monthly emissions. The federally enforceable VOC limitation is based on maximum material usage restrictions

(see B.1 and B.2) and is being established for the purposes of avoiding Title V applicability.

2.c HAP emissions from emissions units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.1	10.4
1-6	5.0	12.5
1-7	5.8	14.5
1-8	6.6	16.6
1-9	7.4	18.7
1-10	8.3	20.8
1-11	9.1	22.8
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

2.d The volatile organic compound (VOC) content of any coating and/or ink employed flexographically in this emissions unit shall not exceed the following limitation:

i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied; or

ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink,

B. Operational Restrictions

1. The maximum annual usage for VOC containing material for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed the following, based upon a rolling, 12-month summation of the material usage figures:

   a. 1,089,115 pounds for inks; and

   b. 4,291,330 pounds for coatings.

   To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Material Usage

Month(s)	Inks (lbs)	Coatings (lbs)
1-1	90759	357610
1-2	181518	715221
1-3	272277	1072831
1-4	363036	1430441
1-5	453795	1788051
1-6	544554	2145661
1-7	635314	2503271
1-8	726074	2860882
1-9	816835	3218496
1-10	907595	3576107
1-11	998356	3933720
1-12	1089115	4291330

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual material usage limitation shall be based upon a rolling, 12-month summation of the monthly material usage rates.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for inks and coatings for emissions units K004, K005, K006, K008, K009, K010, K011 and K012,

combined:

a. The name and identification number of each coating/ink employed.

b. The VOC content of each coating/ink, in percent VOC by volume of the coating/ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for C VOC,5].

c. The VOC content of each coating/ink, in pounds/pounds of ink, as applied.

d. The number of pounds of each coating/ink employed.

e. The total VOC emissions from each coating/ink employed, in pounds or tons ("c" x "d").

f. The total VOC emissions from all the coatings/inks employed, in pounds or tons (summation of "e").

g. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined:

a. For the first 12 months of operation following the issuance of this permit, the cumulative monthly material usage rates for the following, in pounds:

i. inks; and

ii. coatings.

b. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly inks and coatings usage rates, in pounds.

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined:

a. The company identification of each ink and coating employed.

b. The weight percent of each HAP in each, ink and coating, as applied.

c. The amount of each, ink and coating employed, in pounds.

d. The emission rate, in pounds, for each HAP from each ink and coating employed ("b" x "c").

e. The total emission rate for each HAP from all inks and coatings employed (summation of "d" for each HAP for all coatings and inks), in pounds per month.

f. The total HAP emission rate for the combination of all HAPs from all inks and coatings employed (summation of "e" for all HAPs), in pounds per month.

g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combined HAPs, in tons per month.

h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combined HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings/inks (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation of 86.47 tons.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons of and 24.9 tons, respectively (from emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined).

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following material usage limitations specified in section B.1:

   After the first 12 calendar months of operation following issuance of this permit, all exceedances of the following maximum rolling, 12-month material usage limitations :

   i. For inks: 1,089,115 pounds; and

   ii. For coatings: 4,291,330.

5. These quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

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

   a. Emission Limitation: 3.30 lbs VOC/hr, from coatings and inks

      Applicable Compliance Method: The hourly VOC emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

      *The potential to emit for this emissions unit was determined (as demonstrated below) by multiplying the maximum material paperboard processing rate and a maximum VOC content:

      (20.8 lbs/hr)(0.08)= 1.66 lbs VOC/hr inks

      (81.8 lbs/hr)(0.02)= 1.64 lbs/hr coatings

   b. Emission Limitation: 86.47 tons VOC per rolling, 12-month period, for emissions unit's K004, K005, K006, K008, K009, K010, K011 and K012, combined.

      Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.1 and C.2 of this permit.

   c. Emission Limitation: 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for combined HAPs, for emission

units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.3 of this permit..

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

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Issued: To be entered upon final issuance
PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K010) - Flexographic Printing Press 7.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	6.03 lbs volatile organic compounds (VOC)/hr, from coatings and inks. See A.2.a.
OAC rule 3745-31-05(C)	86.47 tons VOC per rolling, 12-month period (for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined) See A.2.b. 9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002 combined. See A.2.c.
OAC rule 3745-21-09(Y)(1)(a)(i)	See A.2.d.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(Y)(1)(a)(i).

2.b The emissions of VOCs from emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed 86.47 tons per year based on a rolling 12-month summation of the monthly emissions. The federally enforceable VOC limitation is based on maximum material usage restrictions

(see B.1 and B.2) and is being established for the purposes of avoiding Title V applicability.

2.c HAP emissions from emissions units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.1	10.4
1-6	5.0	12.5
1-7	5.8	14.5
1-8	6.6	16.6
1-9	7.4	18.7
1-10	8.3	20.8
1-11	9.1	22.8
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

2.d The volatile organic compound (VOC) content of any coating and/or ink employed flexographically in this emissions unit shall not exceed the following limitation:

i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied; or

ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink, as applied.

B. Operational Restrictions

1. The maximum annual usage for VOC containing material for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed the following, based upon a rolling, 12-month summation of the material usage figures:

   a. 1,089,115 pounds for inks; and

   b. 4,291,330 pounds for coatings.

   To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Material Usage

Month(s)	Inks (lbs)	Coatings (lbs)
1-1	90759	357610
1-2	181518	715221
1-3	272277	1072831
1-4	363036	1430441
1-5	453795	1788051
1-6	544554	2145661
1-7	635314	2503271
1-8	726074	2860882
1-9	816835	3218496
1-10	907595	3576107
1-11	998356	3933720
1-12	1089115	4291330

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual material usage limitation shall be based upon a rolling, 12-month summation of the monthly material usage rates.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for inks and

coatings for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined:

a. The name and identification number of each coating/ink employed.

b. The VOC content of each coating/ink, in percent VOC by volume of the coating/ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for C VOC,5].

c. The VOC content of each coating/ink, in pounds/pounds of ink, as applied.

d. The number of pounds of each coating/ink employed.

e. The total VOC emissions from each coating/ink employed, in pounds or tons ("c" x "d").

f. The total VOC emissions from all the coatings/inks employed, in pounds or tons (summation of "e").

g. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined:

a. For the first 12 months of operation following the issuance of this permit, the cumulative monthly material usage rates for the following, in pounds:

i. inks; and

ii. coatings.

b. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly inks and coatings usage rates, in pounds.

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined:

a. The company identification of each ink and coating employed.

b. The weight percent of each HAP in each, ink and coating, as applied.

c. The amount of each, ink and coating employed, in pounds.

d. The emission rate, in pounds, for each HAP from each ink and coating employed ("b" x "c").

e. The total emission rate for each HAP from all inks and coatings employed (summation of "d" for each HAP for all coatings and inks), in pounds per month.

f. The total HAP emission rate for the combination of all HAPs from all inks and coatings employed (summation of "e" for all HAPs), in pounds per month.

g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combined HAPs, in tons per month.

h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combined HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings/inks (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation of 86.47 tons.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons of and 24.9 tons, respectively (from emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined).

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following material usage limitations specified in section B.1:

   After the first 12 calendar months of operation following issuance of this permit, all exceedances of the following maximum rolling, 12-month material usage limitations :

   i. For inks: 1,089,115 pounds; and

   ii. For coatings: 4,291,330.

5. These quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

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

   a. Emission Limitation: 6.05 lbs VOC/hr, from coatings and inks

      Applicable Compliance Method: The hourly VOC emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

      *The potential to emit for this emissions unit was determined (as demonstrated below) by multiplying the maximum material paperboard processing rate and a maximum VOC content:

      (38.0 lbs/hr)(0.08)= 3.04 lbs VOC/hr inks

      (149.7 lbs/hr)(0.02)= 2.99 lbs/hr coatings

   b. Emission Limitation: 86.47 tons VOC per rolling, 12-month period, for emissions unit's K004, K005, K006, K008, K009, K010, K011 and K012, combined.

      Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.1 and C.2 of this permit.

   c. Emission Limitation: 9.9 tons per rolling, 12-month period for any individual HAP

and 24.9 tons per rolling, 12-month period for combined HAPs, for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.3 of this permit..

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

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Emissions Unit ID: **K011**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K011) - Flexographic Printing Press 8.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	4.40 lbs volatile organic compounds (VOC)/hr from coatings and inks. See A.2.a.
OAC rule 3745-31-05(C)	86.47 tons VOC per rolling, 12-month period (for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined) See A.2.b. 9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002 combined. See A.2.c.
OAC rule 3745-21-09(Y)(1)(a)(i)	See A.2.d.
ORC 3704.03(F)(4)(b) OAC rule 3745-114-01	See F.1

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(Y)(1)(a)(i).

2.b The emissions of VOCs from emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed 86.47 tons per year based on

a rolling 12-month summation of the monthly emissions. The federally enforceable VOC limitation is based on maximum material usage restrictions (see B.1 and B.2) and is being established for the purposes of avoiding Title V applicability.

2.c HAP emissions from emissions units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.1	10.4
1-6	5.0	12.5
1-7	5.8	14.5
1-8	6.6	16.6
1-9	7.4	18.7
1-10	8.3	20.8
1-11	9.1	22.8
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

2.d The volatile organic compound (VOC) content of any coating and/or ink employed flexographically in this emissions unit shall not exceed the following limitation:

i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied; or

ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink, as applied.

B. Operational Restrictions

1. The maximum annual usage for VOC containing material for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed the following, based upon a rolling, 12-month summation of the material usage figures:

a. 1,089,115 pounds for inks; and

b. 4,291,330 pounds for coatings.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Material Usage

Month(s)	Inks (lbs)	Coatings (lbs)
1-1	90759	357610
1-2	181518	715221
1-3	272277	1072831
1-4	363036	1430441
1-5	453795	1788051
1-6	544554	2145661
1-7	635314	2503271
1-8	726074	2860882
1-9	816835	3218496
1-10	907595	3576107
1-11	998356	3933720
1-12	1089115	4291330

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual material usage limitation shall be based upon a rolling, 12-month summation of the monthly material usage rates.

Issued: To be entered upon final issuance

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for inks and coatings for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined:

   a. The name and identification number of each coating/ink employed.

   b. The VOC content of each coating/ink, in percent VOC by volume of the coating/ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for C VOC,5].

   c. The VOC content of each coating/ink, in pounds/pounds of ink, as applied.

   d. The number of pounds of each coating/ink employed.

   e. The total VOC emissions from each coating/ink employed, in pounds or tons ("c" x "d").

   f. The total VOC emissions from all the coatings/inks employed, in pounds or tons (summation of "e").

   g. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined:

   a. For the first 12 months of operation following the issuance of this permit, the cumulative monthly material usage rates for the following, in pounds:

      i. inks; and

      ii. coatings.

   b. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly inks and coatings usage rates, in pounds.

3. In order to demonstrate compliance with the annual HAP emission limitations, the

permittee shall collect and record the following information each month for emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined:

a. The company identification of each ink and coating employed.

b. The weight percent of each HAP in each, ink and coating, as applied.

c. The amount of each, ink and coating employed, in pounds.

d. The emission rate, in pounds, for each HAP from each ink and coating employed ("b" x "c").

e. The total emission rate for each HAP from all inks and coatings employed (summation of "d" for each HAP for all coatings and inks), in pounds per month.

f. The total HAP emission rate for the combination of all HAPs from all inks and coatings employed (summation of "e" for all HAPs), in pounds per month.

g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combined HAPs, in tons per month.

h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combined HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings/inks (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation of 86.47 tons.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all

exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons of and 24.9 tons, respectively (from emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined).

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following material usage limitations specified in section B.1:

   After the first 12 calendar months of operation following issuance of this permit, all exceedances of the following maximum rolling, 12-month material usage limitations :

   i. For inks: 1,089,115 pounds; and

   ii. For coatings: 4,291,330.

5. These quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

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

   a. Emission Limitation: 4.40 lbs VOC/hr, from coatings and inks

      Applicable Compliance Method: The hourly VOC emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

      *The potential to emit for this emissions unit was determined (as demonstrated below) by multiplying the maximum material paperboard processing rate and a maximum VOC content:

      (27.7 lbs/hr)(0.08)= 2.22 lbs VOC/hr inks

      (109.1 lbs/hr)(0.02)= 2.18 lbs/hr coatings

   b. Emission Limitation: 86.47 tons VOC per rolling, 12-month period, for emissions unit's K004, K005, K006, K008, K009, K010, K011 and K012, combined.

      Applicable Compliance Method: Compliance shall be based on the record

keeping requirements as specified in Section C.1 and C.2 of this permit.

c. Emission Limitation: 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for combined HAPs, for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.3 of this permit..

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

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Emissions Unit ID: **K012**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K012) - Flexographic Printing Press 9.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	2.43 lbs volatile organic compounds (VOC)/hr from coatings and inks. See A.2.a.
OAC rule 3745-31-05(C)	86.47 tons VOC per rolling, 12-month period (for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined) See A.2.b. 9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002 combined. See A.2.c.
OAC rule 3745-21-09(Y)(1)(a)(i)	See A.2.d.
ORC 3704.03(F)(4)(b) OAC rule 3745-114-01	See F.1

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(Y)(1)(a)(i).

2.b The emissions of VOCs from emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed 86.47 tons per year based on

a rolling 12-month summation of the monthly emissions. The federally enforceable VOC limitation is based on maximum material usage restrictions (see B.1 and B.2) and is being established for the purposes of avoiding Title V applicability.

2.c HAP emissions from emissions units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.1	10.4
1-6	5.0	12.5
1-7	5.8	14.5
1-8	6.6	16.6
1-9	7.4	18.7
1-10	8.3	20.8
1-11	9.1	22.8
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

2.d The volatile organic compound (VOC) content of any coating and/or ink employed flexographically in this emissions unit shall not exceed the following limitation:

i. forty percent VOC by volume of the coating and ink, excluding water and exempt

solvents, as applied; or

ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink, as applied.

B. Operational Restrictions

1. The maximum annual usage for VOC containing material for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined, shall not exceed the following, based upon a rolling, 12-month summation of the material usage figures:

   a. 1,089,115 pounds for inks; and

   b. 4,291,330 pounds for coatings.

   To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative usage levels specified below:

Maximum Allowable Cumulative Material Usage

Month(s)	Inks (lbs)	Coatings (lbs)
1-1	90759	357610
1-2	181518	715221
1-3	272277	1072831
1-4	363036	1430441
1-5	453795	1788051
1-6	544554	2145661
1-7	635314	2503271
1-8	726074	2860882
1-9	816835	3218496
1-10	907595	3576107
1-11	998356	3933720
1-12	1089115	4291330

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual material usage limitation shall be based upon a rolling, 12-month summation of the monthly material usage rates.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for inks and coatings for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined:

   a. The name and identification number of each coating/ink employed.

   b. The VOC content of each coating/ink, in percent VOC by volume of the coating/ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for C VOC,5].

   c. The VOC content of each coating/ink, in pounds/pounds of ink, as applied.

   d. The number of pounds of each coating/ink employed.

   e. The total VOC emissions from each coating/ink employed, in pounds or tons ("c" x "d").

   f. The total VOC emissions from all the coatings/inks employed, in pounds or tons (summation of "e").

   g. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for emissions units K004, K005, K006, K008, K009, K010, K011 and K012, combined:

   a. For the first 12 months of operation following the issuance of this permit, the cumulative monthly material usage rates for the following, in pounds:

      i. inks; and

      ii. coatings.

   b. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly inks and coatings usage rates, in pounds.

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions

units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined:

a. The company identification of each ink and coating employed.

b. The weight percent of each HAP in each, ink and coating, as applied.

c. The amount of each, ink and coating employed, in pounds.

d. The emission rate, in pounds, for each HAP from each ink and coating employed ("b" x "c").

e. The total emission rate for each HAP from all inks and coatings employed (summation of "d" for each HAP for all coatings and inks), in pounds per month.

f. The total HAP emission rate for the combination of all HAPs from all inks and coatings employed (summation of "e" for all HAPs), in pounds per month.

g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combined HAPs, in tons per month.

h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combined HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings/inks (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation of 86.47 tons.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month individual HAP and combined HAPs emission

limitations of 9.9 tons of and 24.9 tons, respectively (from emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined).

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following material usage limitations specified in section B.1:

   After the first 12 calendar months of operation following issuance of this permit, all exceedances of the following maximum rolling, 12-month material usage limitations :

   i. For inks: 1,089,115 pounds; and

   ii. For coatings: 4,291,330.

5. These quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

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

   a. Emission Limitation: 2.43 lbs VOC/hr, from coatings and inks

      Applicable Compliance Method: The hourly VOC emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

      *The potential to emit for this emissions unit was determined (as demonstrated below) by multiplying the maximum material paperboard processing rate and a maximum VOC content:

      (15.3 lbs/hr)(0.08)= 1.22 lbs VOC/hr inks

      (60.4 lbs/hr)(0.02)= 1.21 lbs VOC /hr coatings

   b. Emission Limitation: 86.47 tons VOC per rolling, 12-month period, for emissions unit's K004, K005, K006, K008, K009, K010, K011 and K012, combined.

      Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.1 and C.2 of this permit.

c. Emission Limitation: 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for combined HAPs, for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.3 of this permit..

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

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Issued: To be entered upon final issuance
PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(P001) - Flexographic Plate Making Equipment (Adminstrative modification of PTI #03-08930 issued on March 13, 1996 to revise emission limitations).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	0.38 lb volatile organic compounds (VOC)/hr and 1.66 tons VOC/yr See A.2.a.
OAC rule 3745-21-07(G)(2)	See A.2.b and B.1

2. Additional Terms and Conditions

2.a Best Available Technology (BAT) requirements have been determined to be compliance with the terms and conditions of this permit.

2.b On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio.

It should be noted that OAC rule 3745-21-07(G)(2) does not establish any requirements for this emissions unit due to the restriction prohibiting the use of photochemically reactive material (See B.1). The restriction on the use of photochemically reactive material shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

Emissions Unit ID: **P001**

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for emissions unit P001 each month:

   a. The name and identification number of each plate wash solvent formulation, as applied.

   b. The VOC emission factor of each plate wash solvent formulation employed in pounds/ft2, as applied.

   c. The usage, in ft2, of each plate wash solvent employed.

   d. The amount of VOC emitted from each plate wash solvent employed, in pounds (b x c).

   e. The total amount of VOC emitted from all plate wash solvents employed in the flexographic plate making unit [summation of (d)].

   f. The total cumulative VOC emissions for the calendar year to date [summation of (e) from January through December].

   g. documentation of whether or not each plate wash solvent is a photochemically reactive material, as defined in OAC rule 3745-21-01;

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days

following the end of the calendar month.

E. Testing Requirements

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

   a. Emission Limitation: 0.38 lb VOC/hr and 1.66 tons VOC/yr

      Applicable Compliance Method: The hourly VOC emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

      *The potential to emit for this emissions unit was determined (as demonstrated below) by multiplying the maximum hourly material usage rate and an emission factor of 0.0392 (based on information from the vendor)

      (9.62 ft2/hr)(0.0392 lb/ft2)= 0.38 lb VOC/hr

      The annual emission limitations were established by multiplying the hourly emission limitations by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore provided compliance is shown the hourly limitation, compliance with the annual limitation will be assumed.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Emissions Unit ID: **P002**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(P002) - Scrap Processing

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	0.18 pounds particulate matter equal to or less than 10 microns in size (PM10) and 0.79 ton per year. Visible particulate emissions shall not exceed 0% opacity, as a six minute average. See A.2.c.
OAC rule 3745-17-11(B)	See A.2.a.
OAC rule 3745-17-07(A)	See A.2.b.

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Table I does not apply pursuant to OAC rule 3745-17-11(A)(2)(b)(i).

2.b The emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.c Permit to Install 03-17431 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

i. use of a baghouse achieving a minimum removal efficiency of 98% (100% capture) for particulate matter and an associated 0% opacity, as a

six-minute average.

The potential to emit for this emissions unit is 0.79 tons PM10/year and was determined by applying a 98% control efficiency to a maximum uncontrolled mass emission rate of 9.0 lbs particulate matter per hour and multiplying by a maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. The maximum uncontrolled mass rate of emissions was determined by multiplying an emission factor of 1.8 lb per ton (based on data from similar operations) by a maximum production rate of 5 tons per hour.

All particulate matter emissions are PM10.

B. Operational Restrictions

1. The permittee shall operate the baghouse at all times when the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:

   a. the color of the emissions;
   b. the total duration of any visible emission incident; and
   c. any corrective actions taken to eliminate the visible emissions.

2. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the baghouse was not operating.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions from the baghouse stack and. These reports shall be submitted to the Ohio EPA, NWDO by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the baghouse was not operating. Each report shall be submitted within 30 days after the deviation occurs.

Emissions Unit ID: **P002**

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation: 0.18 pounds PM10/hr

      Applicable Compliance Method:
      The hourly emission limitation was established by applying a 98% control efficiency to an uncontrolled mass emission rate of 9.0 pounds particulate matter per hour. The uncontrolled mass emission rate was determined by multiplying an emission factor of 1.8 lbs per ton by a maximum production rate of 5 tons per hour. If required, the permittee shall demonstrate compliance with the PM10 emission limitation by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

   b. Emission Limitation: 0.79 tons PM10/yr

      Applicable Compliance Method:
      The annual emission limitation was developed by multiplying the maximum hourly emission rate of 0.18 pounds PM10 per hour by a maximum operating schedule of 8,760 hours per year and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

   c. Emission Limitation:
      Visible particulate emissions shall not exceed 0% opacity as a 6-minute average.

      Applicable Compliance Method:
      Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

F. Miscellaneous Requirements

None

Issued: To be entered upon final issuance
PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(R001) - Gluing Machines *(Modification to allow for the increase in production).*

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002 combined. See A.2.a. 3.68 lbs volatile organic compounds (VOC)/hr and 3.83 tons per rolling, 12-month period, from glues. See A.2.b and A.2.e.
OAC rule 3745-21-07(G)(2)	See A.2.c and B.2.

2. Additional Terms and Conditions

2.a HAP emissions from emissions units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.1	10.4
1-6	5.0	12.5
1-7	5.8	14.5
1-8	6.6	16.6
1-9	7.4	18.7
1-10	8.3	20.8
1-11	9.1	22.8
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

2.b This permit establishes the following federally enforceable emission limitation based on an hours of operation restriction (See B.1) for purposes of limiting potential to emit (PTE):

3.83 tons VOC per rolling, 12-month period

2.c On February 18, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio.

It should be noted that OAC rule 3745-21-07(G)(2) does not establish any requirements for this emissions unit due to the restriction prohibiting the use of photochemically reactive material (See B.2). The restriction on the use of photochemically reactive material shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

2.d The purpose of this permit action is to allow for an increase in production. Emissions unit R001 was contained in PTI #03-08930 issued on March 13, 1996. Emissions unit R001 was involved in a partial revocation of PTI #03-08930 to allow the unit to operate under permit-by-rule exemptions.

2.e The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to VOC from this air contaminant source since the potential to emit is less than ten tons per year, taking into account the federally enforceable restriction on hours of operation.

B. Operational Restrictions

1. The maximum annual operating hours for emissions unit R001 shall not exceed 2080 hours, based upon a rolling, 12-month summation of monthly numbers of hours of operation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum Allowable Hours Operated
1	173
1-2	346
1-3	519
1-4	692
1-5	865
1-6	1038
1-7	1211
1-8	1384
1-9	1560
1-10	1733
1-11	1907
1-12	2080

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling 12-month summation of monthly operating hours.

2. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

C. Monitoring and/or Recordkeeping Requirements

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

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

   b. The VOC content of each glue employed in pounds/pounds of glue, as applied.

   c. The number of pounds of each glue employed.

   d. The amount of VOC emitted from each glue employed, in pounds (b x c).

   e. The total amount of VOC emitted from all glues employed in the gluing machines [summation of (d)].

   f. The total cumulative VOC emissions for the calendar year to date [summation of (e) from January through December].

   g. documentation of whether or not each glue employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

2. The permittee shall maintain monthly records of the following information for this emissions unit:

   a. number of hours operated;

   b. during the first 12 calendar months of operation, the cumulative number of hours operated;

   c. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of the number of hours operated;

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined:

   a. The company identification of each ink and coating employed.

   b. The weight percent of each HAP in each, ink and coating, as applied.

c. The amount of each, ink and coating employed, in pounds.

d. The emission rate, in pounds, for each HAP from each ink and coating employed ("b" x "c").

e. The total emission rate for each HAP from all inks and coatings employed (summation of "d" for each HAP for all coatings and inks), in pounds per month.

f. The total HAP emission rate for the combination of all HAPs from all inks and coatings employed (summation of "e" for all HAPs), in pounds per month.

g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combined HAPs, in tons per month.

h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combined HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons of and 24.9 tons, respectively (from emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined).

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation of 3.83 tons.

3. The permittee shall submit quarterly deviation (excursion) reports which identify the following:

   a. All exceedances of the rolling, 12-month restriction of 2080 hours;

   b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation specified in section B.1.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

5. These quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

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

   a. Emission Limitations: 3.68 lbs VOC/hr and 3.83 tons VOC/yr from glues

      Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

      *Potential to emit for this emissions unit was established by multiplying the maximum usage rate of 92 lbs/hr by a VOC content of 0.04.

      The annual emission limitations were established by multiplying the hourly emission limitation by a maximum operating schedule of 2080 hours per rolling, 12-month period and dividing by 2000 lbs/ton. Therefore provided compliance is shown the hourly limitation and with the 2080 hours per rolling 12-month period operational restriction, compliance with the annual limitation shall be assumed.

   b. Emission Limitation: 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs, for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined.

      Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.3 of this permit.

F. Miscellaneous Requirements

Issued: To be entered upon final issuance

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Emissions Unit ID: **R002**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(R002) - Former Machines.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs, for emission units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined. See A.2.a. 0.40 lbs volatile organic compounds (VOC)/hr and 0.42 tons/yr from glues. See A.2.b and A.2.e.
OAC rule 3745-21-07(G)(2)	See A.2.c and B.2.

2. Additional Terms and Conditions

2.a HAP emissions from emissions units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Issued: To be entered upon final issuance

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.1	10.4
1-6	5.0	12.5
1-7	5.8	14.5
1-8	6.6	16.6
1-9	7.4	18.7
1-10	8.3	20.8
1-11	9.1	22.8
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

2.b This permit establishes the following federally enforceable emission limitations based on an hours of operation restriction (See B.1) for purposes of limiting potential to emit (PTE):

0.42 ton VOC per rolling, 12-month period

2.c On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio.

It should be noted that OAC rule 3745-21-07(G)(2) does not establish any requirements for this emissions unit due to the restriction prohibiting the use of photochemically reactive material (See B.2). The restriction on the use of photochemically reactive material shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

2.d The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to VOC from this air contaminant source since the potential to emit is less than ten tons per year, taking into account the federally enforceable restriction on hours of operation.

B. Operational Restrictions

1. The maximum annual operating hours for emissions unit R001 shall not exceed 2080 hours, based upon a rolling, 12-month summation of operating hours. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum Allowable Hours Operated
1	173
1-2	346
1-3	519
1-4	692
1-5	865
1-6	1038
1-7	1211
1-8	1384
1-9	1560
1-10	1733
1-11	1907
1-12	2080

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling 12-month summation of monthly operating hours.

2. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

C. Monitoring and/or Recordkeeping Requirements

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

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

b. The VOC content of each glue employed in pounds/pounds of glue, as applied.

c. The number of pounds of each glue employed.

d. The amount of VOC emitted from each glue employed, in pounds (b x c).

e. The total amount of VOC emitted from all glues employed in the gluing machines [summation of (d)].

f. The total cumulative VOC emissions for the calendar year to date [summation of (e) from January through December].

g. documentation of whether or not each glue employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

2. The permittee shall maintain monthly records of the following information for this emissions unit:

a. number of hours operated;

b. during the first 12 calendar months of operation, the cumulative number of hours operated;

c. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of the number of hours operated;

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined:

a. The company identification of each ink and coating employed.

b. The weight percent of each HAP in each, ink and coating, as applied.

c. The amount of each, ink and coating employed, in pounds.

d. The emission rate, in pounds, for each HAP from each ink and coating employed ("b" x "c").

e. The total emission rate for each HAP from all inks and coatings employed (summation of "d" for each HAP for all coatings and inks), in pounds per month.

f. The total HAP emission rate for the combination of all HAPs from all inks and coatings employed (summation of "e" for all HAPs), in pounds per month.

g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combined HAPs, in tons per month.

h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combined HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons of and 24.9 tons, respectively (from emissions units K004, K005, K006, K008, K009, K010, K011, K012, R001 and R002, combined).

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation of 0.42 ton.

3. The permittee shall submit quarterly deviation (excursion) reports which identify the following:

   a. All exceedances of the rolling, 12-month restriction of 2080 hours;

   b. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation specified in section B.1.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

5. These quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

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

a. Emission Limitation: 0.40 lb VOC/hr and 0.42 ton VOC/yr from glues

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was established by multiplying the maximum usage rate of 10 tons of glue/yr by a VOC content of 0.04.

The annual emission limitations were established by multiplying the hourly emission limitations by a maximum operating schedule of 2080 hours per rolling, 12-month period and dividing by 2000 lbs/ton. Therefore provided compliance is shown the hourly limitation and with the 2080 hours per rolling 12-month period operational restriction, compliance with the annual limitation shall be assumed.

b. Emission Limitation: 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs, for emissions units K004, K005, K006, K008, K009, K010, K011, K012 , R001 and R002, combined.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section C.3 of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.