

Facility ID: 0351010064 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0351010064 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flexographic Printing Line with Associated Gluing Operation	PTI #03-8827 3745-21-09(Y)	See Additional Terms & Conditions None (exempt from rule since total coating and ink usages are less than 148 tons/year)

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) emissions from the flexographic printing and associated gluing operations shall not exceed 1597 lbs/month and 9.58 tons/year. (This emissions unit does not employ clean-up material.)
The volatile organic compound (VOC) content of each coating or ink employed in the flexographic press shall not exceed:
 - i. forty percent VOC by volume of the coating or ink, excluding water; or
 - ii. twenty-five percent VOC by volume of the volatile matter in the coating or ink.
The VOC emissions from the application of inks in this emissions unit shall not exceed 347 lbs VOC/month.
The VOC emissions from adhesives employed in the gluing operation shall not exceed 1250 lbs VOC/month.

B. Operational Restrictions

1. This permit allows for the use of the coatings specified by the permittee in PTI number 03-8827. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the VOC emission limitations specified in this permit are based on the coating material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA/NWDO, including the possible issuance of modifications to PTI number 03-8827 and the operating permit:
Any change in the composition of the coatings, or use of new coatings, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].
Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
Any change in the composition of the coatings, or use of new coatings, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPs) as defined in OAC rule 3745-77-01(V).

C. Monitoring and/or Record Keeping Requirements

1. The company shall collect and record the following information for inks applied flexographically in this emissions unit each month:
the name and identification number of ink, as applied;
the percent VOC by volume of each ink (excluding water and exempt solvents) as applied;
the percent VOC by volume of the volatile matter in the ink;
the volume, in gallons, of each ink employed;
the amount of VOC emitted from each ink employed; and
the total amount of VOC emitted from all inks employed.
2. The company shall collect and record the following information for coatings employed in the associated gluing operation in this emissions unit each month:

the name and identification number of each adhesive, as applied;
the mass of VOC per volume of each adhesive employed (lb/gallon), as applied;
the volume, in gallons, of each adhesive employed;
the amount of VOC emitted from each adhesive employed (lbs/month); and
the total amount of VOC emitted from all adhesives employed (lbs/month).

3. The company shall collect and record the combined monthly (lbs/month) emission rate from all adhesives and inks employed in this emissions unit each month*.
4. The company shall collect and record the combined annual (ton/year) emission rate from all adhesives and inks employed in this emissions unit each year**.

* Monthly emission rates shall be calculated during the first "full week" of the succeeding month.

** Annual emission rates shall be calculated during the first "full week" of January for the preceding calendar year.

D. Reporting Requirements

1. The permittee shall submit annual reports which identify any exceedances of the 9.58 tons VOC/year limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly reports which identify any exceedances of the 1597, 347, and 1250 lbs VOC/month limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall submit quarterly reports which identify any exceedances of either the forty percent VOC by volume of the ink, excluding water, or the twenty-five percent VOC by volume of the volatile matter in the ink limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

E. Testing Requirements

1. Any determination of VOC content*, solids content, or density of an adhesive, ink, and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all volatile organic compounds that are in a coating material expressed as pounds of VOC per gallon.

F. Miscellaneous Requirements

1. None