

Facility ID: 0630010010 Issuance type: Final State Permit To Operate

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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: 0630010010 Emissions Unit ID: R001 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 Controlled with a Catalytic Thermal Oxidizer	OAC rule 3745-31-05(A)(3) (PTI #06-1343 issued 9/18/85)	Emissions of Volatile Organic Compounds (VOC) shall not exceed 6.0 tons/yr.
	OAC rule 3745-21-09(Y)(1)(b)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(b). Exempt unless total maximum usage of coatings and inks in all flexographic printing lines exceeds 148 tons per year. If usage exceeds 148 tons per year, the capture efficiency for VOC shall be at least sixty-five percent by weight and the control efficiency for VOC shall be at least ninety percent by weight.
	OAC rule 3745-21-09(Y)(2)(b)	Paragraph (Y)(1) of this rule shall not apply to any printing line which is located at a facility in which the total maximum usage of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines is less than or equal to 148 tons per year.

2. **Additional Terms and Conditions**
  - (a) None

**B. Operational Restrictions**

1. The catalytic thermal oxidizer inlet temperature shall be a minimum of 600 degrees Fahrenheit during any operation of the emissions unit.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month:
  - a. The name and identification number of each coating, ink, and cleanup material, as applied.
  - b. The number of gallons of each coating, ink and cleanup material employed.
  - c. The VOC content of each coating, ink, and cleanup material, in pounds per gallon, excluding water and exempt solvents, as applied.
  - d. The total uncontrolled VOC emissions from all coatings, inks, and cleanup materials employed, in tons.
  - e. The total controlled VOC emissions for all coatings, inks, and cleanup materials, in tons (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).
  - f. The number of tons of all coatings and inks employed.
  - g. The year-to-date total usage of coatings and inks in all flexographic printing lines at the facility, in tons.

- h. The year-to-date total VOC emissions from all coatings, inks, and cleanup materials employed, in tons.

Note: "As applied" refers to the base coating plus all additives.

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

**D. Reporting Requirements**

1. The permittee shall submit annual reports which include the total usage of coatings and inks in all flexographic printing lines at this facility during the calendar year, in tons, as well as the annual total VOC emissions from this emissions unit. This report shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the catalytic thermal oxidizer inlet temperature, when the emissions unit was in operation, does not comply with the temperature limitation specified above. The deviation reports shall be submitted within 30 days after the deviation occurs.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:

Emissions of VOC shall not exceed 6.0 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.h.  
Emission Limitation:

If total maximum usage of coatings and inks in all flexographic printing lines exceeds 148 tons per year, the capture efficiency for VOC shall be at least sixty-five percent by weight and the control efficiency for VOC shall be at least ninety percent by weight.

Applicable Compliance Method:

Although not applicable unless total maximum usage of coatings and inks exceeds 148 tons per year, the permittee demonstrated compliance with the above capture and control efficiency requirements through emission testing performed 8/16/02. If total maximum usage exceeds 148 tons per year, it may be necessary to demonstrate compliance with the VOC capture and control efficiency requirements through emission testing performed in accordance with Method 25 or Method 25A (if less than 50 ppm) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

3. Formulation data or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings, inks and cleanup materials.

**F. Miscellaneous Requirements**

1. None