Facility Name: **Flint Ink North America Corp**
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GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(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 Ohio Administrative Code (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.

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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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Flint Ink North America Corp** located in **Warren** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P001	2,000 gallon ink mixer with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07(A)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT
			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 29.9 TPY OC per mixer
P002	2,000 gallon ink mixer with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07(A)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT

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P002 Cont'd			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 29.9 TPY OC per mixer
P003	1,000 gallon ink mixer with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07(A)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT
			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 27.2 TPY OC per mixer
P004	1,000 gallon ink mixer with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07(A)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P004 Cont'd			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 27.2 TPY OC per mixer
P005	HM 60 mill/blender with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07(A)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT
			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 4.2 TPY OC per blender
P006	HM 60 mill/blender with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07(A)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT

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P006 Cont'd			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 4.2 TPY OC per blender
P007	HM 40 mill/blender with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT
			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 1.4 TPY OC per blender
P008	HM 40 mill/blender with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P008 Cont'd			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 1.4 TPY OC per blender
P009	50 hp mixer/ disperser with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT
			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 7.3 TPY OC per mixer
P010	50 hp mixer/ disperser with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P010 Cont'd			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 7.3 TPY OC per mixer
P011	50 hp mixer/ disperser with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT
			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 7.3 TPY OC per mixer
P012	50 hp mixer/ disperser with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P012 Cont'd			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 7.3 TPY OC per mixer
P013	30 hp mixer/ disperser with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT
			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 7.3 TPY OC per mixer
P014	30 hp mixer/ disperser with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P014 Cont'd			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 7.3 TPY OC per mixer
P015	30 hp mixer/ disperser with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT
			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 7.3 TPY OC per mixer
P016	30 hp mixer/ disperser with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P016 Cont'd			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 7.3 TPY OC per mixer
P017	20 hp mixer/ disperser with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT
			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 8.0 TPY OC per mixer
P018	20 hp mixer/ disperser with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P018 Cont'd			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 8.0 TPY OC per mixer
P019	HM 10 mill/blender and support mill with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT
			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 6.1 TPY OC per mill
P020	HM 10 mill/blender and support mill with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P020 Cont'd			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 6.1 TPY OC per mill
P021	HM 20 mill/blender and support mill with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT
			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 6.5 TPY OC per mill
P022	HM 20 mill/blender and support mill with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P022 Cont'd			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 6.5 TPY OC per mill
P023	HM 40 mill/blender and support mill with fabric filter	Use of tight-fitting covers, use of a fabric filter, compliance with OC and PM/PM_{10} emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-17-07 (A)(1)	See Additional Special Term and Condition A.1.
			3745-17-11(B)*	Less stringent than BAT
			3745-21-07(G)*	Less stringent than BAT
			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC and PM/PM_{10} mass emissions limitations. 6.7 TPY OC per mill
P024	Horizontal tandem mill	Use of tight-fitting covers, compliance with OC emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-21-07(G)*	Less stringent than BAT
			3745-31-05(BAT)	See Additional Special Terms and Conditions A.2. and A.3. for the OC mass

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P024 Cont'd				emissions limits. 6.7 TPY OC per mill
P025	Horizontal tandem mill	Use of tight-fitting covers, compliance with OC emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-21-07(G)* 3745-31-05(BAT)	Less stringent than BAT See Additional Special Terms and Conditions A.2. and A.3. for the OC mass emission limits. 6.7 TPY OC per mill
P026	Portable mixing vessel washing	Use of hoods to capture OC emissions, reclaim spent cleaning solvent, compliance with OC emission limitations, and compliance with the Ohio EPA Air Toxics Policy	3745-21-07(G)* 3745-31-05(BAT)	Less stringent than BAT See Additional Special Terms and Conditions A.2. and A.3. for the OC mass emission limits. 2.6 TPY OC
T001	16600 gallon vertical fixed roof ethyl acetate storage tank	Use of submerged fill and compliance with recordkeeping requirements in Subpart Kb	40 CFR 60 Subpart Kb 3745-31-05(BAT) 3745-21-07(D)	See General Terms 0.54 TPY OC Exempt

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
T002	16,600 gallon vertical fixed roof ethyl alcohol storage tank	Use of submerged fill and compliance with recordkeeping requirements in Subpart Kb	40 CFR 60 Subpart Kb	See General Terms
			3745-31-05(BAT)	0.39 TPY OC
			3745-21-07(D)	Exempt
T003	16,600 gallon vertical fixed roof isopropyl alcohol storage tank	Use of submerged fill and compliance with recordkeeping requirements in Subpart Kb	40 CFR 60 Subpart Kb	See General Terms
			3745-31-05(BAT)	0.08 TPY OC
			3745-21-07(D)	Exempt
T004	16,600 gallon vertical fixed roof n-propyl acetate storage tank	Use of submerged fill and compliance with recordkeeping requirements in Subpart Kb	40 CFR 60 Subpart Kb	See General Terms
			3745-31-05(BAT)	0.25 TPY OC
			3745-21-07(D)	Exempt
T005	16,600 gallon vertical fixed roof n-propyl alcohol storage tank	Use of submerged fill and compliance with recordkeeping requirements in Subpart Kb	40 CFR 60 Subpart Kb	See General Terms
			3745-31-05(BAT)	0.07 TPY OC
			3745-21-07(D)	Exempt
T006	16,600 gallon vertical fixed roof nitrocell-ulose storage tank	Use of submerged fill and compliance with recordkeeping requirements in Subpart Kb	40 CFR 60 Subpart Kb	See General Terms
			3745-31-05(BAT)	0.25 TPY OC
			3745-21-07(D)	Exempt
T007	16,600 gallon vertical fixed roof polyamide varnish storage tank	Use of submerged fill and compliance with recordkeeping requirements in Subpart Kb	40 CFR 60 Subpart Kb	See General Terms
			3745-31-05(BAT)	0.82 TPY OC
			3745-21-07(D)	Exempt

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
T008	17,000 gallon vertical fixed roof toluene storage tank	Use of submerged fill and compliance with recordkeeping requirements in Subpart Kb	40 CFR 60 Subpart Kb	See General Terms
			3745-31-05(BAT)	0.15 TPY OC
			3745-21-07(D)	Exempt
T009	17,000 gallon vertical fixed roof gravure wax storage tank	Use of submerged fill and compliance with recordkeeping requirements in Subpart Kb	40 CFR 60 Subpart Kb	See General Terms
			3745-31-05(BAT)	0.61 TPY OC
			3745-21-07(D)	Exempt

* The emission limitations established by these rules are less stringent than the requirements of OAC rule 3745-31-05(BAT).

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
Organic Compound	65.3
PM	1.0
PM_{10}	1.0

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

Source Number	Source Description	NSPS Regulation (Subpart)
T001-T007	16,600 gallon fixed roof storage tanks	Kb
T008	17,000 gallon fixed roof storage tank	Kb
T009	17,000 gallon fixed roof storage tank	Kb

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

a. construction date (no later than 30 days after such date);
b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
c. actual start-up date (within 15 days after such date); and
d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and **Hamilton County Dept. of Env. Services**
1632 Central Parkway
Cincinnati, OH 45210

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Env. Services**, **1632 Central Parkway, Cincinnati, OH 45210.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

MISCELLANEOUS STORAGE TANKS

Unless otherwise indicated, BAT for any miscellaneous storage tanks identified within this permit consists of the use of submerged fill into the storage tanks. The submerged fill pipe(s) are to be installed within six (6) inches of the bottom of the storage tank.

NEW SOURCE PERFORMANCE STANDARD SUBPART Kb

The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States

Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

Source Number(s)	Tank Size
T001 through T009	16,600 gallon - 17,000 gallon

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

1. Visible particulate emissions from the fabric filter exhaust stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2. The emissions of organic compounds (OC) for the ink mixing operations and associated cleanup operation (emissions units P001 through P026) shall not exceed 62.1 tons per year (TPY) combined, based upon a rolling, 12-month summation of the OC emissions.

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

3. The maximum annual production rate for emissions unit P001 and P002 combined shall not exceed 22,817,000 pounds of ink per year, based upon a rolling, 12-month summation of the production rates.

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

Month	Maximum Allowable Cumulative Production (pounds)
1	1,901,417
1-2	3,802,833
1-3	5,704,250
1-4	7,605,667
1-5	9,507,083
1-6	11,408,500
1-7	13,309,917
1-8	15,211,333
1-9	17,112,750
1-10	19,014,167
1-11	20,915,558
1-12	22,817,000

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

4. The maximum annual production rate for emissions unit P003 and P004 combined shall not exceed 9,822,400 pounds of ink per year, based upon a rolling, 12-month summation of the production rates.

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

Month	Maximum Allowable Cumulative Production (pounds)
1	818,533
1-2	1,637,067
1-3	2,455,600
1-4	3,274,413
1-5	4,092,667
1-6	4,911,200
1-7	5,729,733
1-8	6,548,267
1-9	7,366,800
1-10	8,185,333

1-11	9,003,867
1-12	9,822,400

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

5. The maximum annual production rate for emissions unit P005 and P006 combined shall not exceed 5,688,920 pounds of ink per year, based upon a rolling, 12-month summation of the production rates.

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

Month	Maximum Allowable Cumulative Production (pounds)
1	474,077
1-2	948,153
1-3	1,422,230
1-4	1,896,307
1-5	2,370,383
1-6	2,844,460
1-7	3,318,537
1-8	3,792,613
1-9	4,266,690
1-10	4,740,767
1-11	5,214,843
1-12	5,688,920

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

6. The maximum annual production rate for emissions unit P007 and P008 combined shall not exceed 4,086,720 pounds of ink per year, based upon a rolling, 12-month summation of the production rates.

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

Month	Maximum Allowable Cumulative Production (pounds)
1	340,560
1-2	681,120
1-3	1,021,680
1-4	1,362,240
1-5	1,702,800
1-6	2,043,360
1-7	2,383,920
1-8	2,724,480
1-9	3,065,040
1-10	3,405,600
1-11	3,746,160
1-12	4,086,720

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

7. The maximum annual production rate for emissions unit P009 through P016 combined shall not exceed 9,175,402 pounds of ink per year, based upon a rolling, 12-month summation of the production rates.

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

Month	Maximum Allowable Cumulative Production (pounds)
1	764,617
1-2	1,529,234
1-3	2,293,851
1-4	3,058,467
1-5	3,823,084
1-6	4,587,701
1-7	5,352,318
1-8	6,116,935
1-9	6,881,552
1-10	7,646,168
1-11	8,410,785
1-12	9,175,402

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual

production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

8. The maximum annual production rate for emissions unit P017 and P018 combined shall not exceed 4,065,420 pounds of ink per year, based upon a rolling, 12-month summation of the production rates.

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

Month	Maximum Allowable Cumulative Production (pounds)
1	338,785
1-2	677,570
1-3	1,016,355
1-4	1,355,140
1-5	1,693,925
1-6	2,032,710
1-7	2,371,495
1-8	2,710,280
1-9	3,049,065
1-10	3,387,850
1-11	3,726,635
1-12	4,065,420

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

9. The maximum annual production rate for emissions unit P019 and P020 combined shall not exceed 579,120 pounds of ink per year, based upon a rolling, 12-month summation of the production rates.

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

Month	Maximum Allowable Cumulative Production (pounds)
1	48,260
1-2	96,520
1-3	144,780

1-4	193,040
1-5	241,300
1-6	289,560
1-7	337,820
1-8	386,080
1-9	434,340
1-10	482,600
1-11	530,860
1-12	579,120

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

10. The maximum annual production rate for emissions unit P021 and P022 combined shall not exceed 579,120 pounds of ink per year, based upon a rolling, 12-month summation of the production rates.

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

Month	Maximum Allowable Cumulative Production (pounds)
1	162,529
1-2	325,058
1-3	487,588
1-4	650,117
1-5	812,646
1-6	975,175
1-7	1,137,704
1-8	1,300,233
1-9	1,462,763
1-10	1,625,292
1-11	1,787,821
1-12	1,950,350

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

11. The maximum annual production rate for emissions unit P023 shall not exceed 1,814,880 pounds of ink per year, based upon a rolling, 12-month summation of the production rates.

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

Month	Maximum Allowable Cumulative Production (pounds)
1	151,240
1-2	302,480
1-3	453,720
1-4	604,960
1-5	756,200
1-6	907,440
1-7	1,058,680
1-8	1,209,920
1-9	1,361,160
1-10	1,512,400
1-11	1,663,640
1-12	1,814,880

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

12. The maximum annual production rate for emissions unit P024 and P025 combined shall not exceed 1,282,100 pounds of ink per year, based upon a rolling, 12-month summation of the production rates.

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

Month	Maximum Allowable Cumulative Production (pounds)
1	106,842
1-2	213,683
1-3	320,525
1-4	427,337
1-5	534,208
1-6	641,050
1-7	747,892
1-8	854,733
1-9	961,575

1-10	1,068,417
1-11	1,175,258
1-12	1,282,100

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

13. The emissions of OC and PM/PM_{10} for emissions units P001 through P026 shall not exceed the following:

Emissions Unit(s)	Allowable OC Emissions (lbs/hr)	Allowable PM/PM_{10} Emissions (lbs/hr)
P001	6.82	0.15
P002	6.82	0.15
P003	6.21	0.08
P004	6.21	0.08
P005	0.95	0.01
P006	0.95	0.01
P007	0.33	0.01
P008	0.33	0.01
P009	1.67	0.09
P010	1.67	0.09
P011	1.67	0.09
P012	1.67	0.09
P013	1.67	0.09
P014	1.67	0.09
P015	1.67	0.09
P016	1.67	0.09
P017	1.82	0.05
P018	1.82	0.05
P019	1.40	0.002
P020	1.40	0.002
P021	1.48	0.004
P022	1.48	0.004
P023	1.53	0.01
P024*	1.52	---
P025*	1.52	---
P026*	0.6	---

*There are no PM/PM_{10} emissions associated with emissions units P024 through P026.

14. The emissions of PM/PM_{10} from emissions units P001 through P023 shall not exceed 1.0 tons per year (TPY) combined.

B. Operational Restrictions

1. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the current manufacturers written recommendation.

2. The use of photochemically reactive materials (PRMs) as defined in OAC rule 3745-21-01(C)(5) is prohibited in every ink mixing operation contained within this permit, except emissions unit P007 and P008, where the use of PRM materials shall be allowed.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain the following daily records separately for each emissions unit P001 through P026:

   a. the name and identification of the product(s) manufactured or used in each emissions unit;

   b. the amount of solids used, in pounds, in each emissions unit;

   c. the amount of solvent used, in pounds, in each emissions unit;

   d. the actual hours of operation of each emissions unit;

   e. the actual OC emissions, in pounds, for each emissions unit;

   f. the actual PM/PM_{10} emissions, in pounds, for each emissions unit;

   g. the actual hourly (average) OC emissions [(e)/(d)] for each emissions unit; and,

   h. the actual hourly (average) PM/PM_{10} emissions [(f)/(d)] for each emissions unit.

2. The permittee shall collect and record the following information each month for emissions unit P001 through P026:

   a. the company identification of each liquid organic material manufactured in each emissions unit; and,

b. a record of each liquid organic material manufactured in each emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

3. The permittee shall maintain monthly records of the OC emissions, in tons, for emissions units P001 through P026 combined.

   The permittee shall maintain monthly records of the updated rolling, 12-month summation of OC emissions, in tons, for emissions units P001 through P026 combined. During the first twelve calendar months of operation, the permittee shall maintain monthly records of the actual cumulative OC emissions, in tons, for emissions units P001 through P026 combined.

4. The permittee shall maintain monthly records of the following information for emissions units P001 through P026:

   a. the ink production rate, in pounds, for the emissions units, as combined, in section A.3. through A.12; and,

   b. during the first 12 calendar months of operation, the permittee shall maintain monthly records of the actual cumulative ink production for emissions units P001 through P026. Beginning after the first 12 calendar months of operation, the permittee shall maintain records of the rolling, 12-month summations of the ink production rates.

5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

6. 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 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.

D. <u>Reporting Requirements</u>

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the annual PM/PM_{10} emission limit and the rolling, 12-month OC emission limitation and, for the first 12 months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emissions levels, for emissions units P001 through P026 combined.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month combined ink production limitations and, for the first 12 months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels for emissions units P001 through P025, as outlined in section A.3. through A.12. of these terms and conditions.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Additional Special Term and Condition B.1.

4. The permittee shall submit an annual report which identifies each day during which any photochemically reactive material was employed in any ink mixing operation other than emissions units P007 and P008. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted by February 15 of each year and shall cover the previous 12 calendar months.

5. The permittee shall submit annual reports which specify the total OC emissions from emissions units P001-P026. These reports shall be submitted by January 31 of each year.

6. 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 Hamilton County Dept. of Env. Services; and,

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 Hamilton County Dept. of Env. Services.

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 30, April 30, July 30, and October 30 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).

E. <u>Testing Requirements</u>

1. Compliance with the visible emissions limitation in Section A.1. of these Additional Special Terms and Conditions shall be demonstrated by the methods outlined in OAC rule 3745-17-03(B)(1).

2. Compliance with the combined TPY OC emissions limitations in section A.2. of these Additional Special Terms and Conditions shall be demonstrated by the recordkeeping requirements in section C.3. of these Additional Special Terms and Conditions. The permittee shall use the calculation methods outlined in EPA document EPA-450/R-94-020, February 1994, “Control of Volatile Organic Compound Emissions from Batch Processes” to calculate the actual OC emissions.

3. Compliance with the annual combined ink production limitations for emissions units P001 through P025, as outlined in section A.3. through A.12. of these Additional Special Terms and Conditions, shall be demonstrated by the recordkeeping requirements in section C.4. of these Additional Special Terms and Conditions.

4. Compliance with the lbs/hr OC emissions limitations in section A.13. of these Additional Special Terms and

Conditions shall be demonstrated by the recordkeeping requirements in section C.1. of these Additional Special Terms and Conditions.

The permittee shall use the calculation methods outlined in EPA document EPA-450/R-94-020, February 1994, "Control of Volatile Organic Compound Emissions from Batch Processes" to calculate the actual OC emissions.

5. Compliance with the PM/PM_{10} emissions limitations in Section A.13. of these Additional Special Terms and Conditions shall be demonstrated by applying the AP-42 emission factor for Paint and Varnish Mixing in the following equation:

   a. solids [lbs/hr (average)]) X EF (20 lbs PM/ton) X control efficiency (1-0.99) X ton/2000 lbs = lbs PM/PM_{10}/hr.

6. Compliance with the OC emissions limitation on the Air Emissions Summary page of this permit for T001 through T009 shall be demonstrated by methods outlined in AP-42, Storage of Organic Liquids.

7. Compliance with the operational restrictions in Section B.1. of these Additional Special Terms and Conditions shall be demonstrated by the recordkeeping requirement in Section C.5. of these Additional Special Terms and Conditions.

8. Compliance with the operational restriction in Section B.2. of these Additional Special Terms and Conditions shall be demonstrated by the recordkeeping requirement in Section C.2. of these Additional Special Terms and Conditions.

F. <u>Miscellaneous Requirements</u>

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4620. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3 model and a comparison of

the predicted 1 hour maximum ground-level concentration to the MAGLC.

The following summarizes the results of the modeling for each pollutant:

Pollutant: ethyl alcohol (*highest emission rate)

TLV (ug/m3): 1880000
Maximum Hourly Emission Rate (lbs/hr): 221.7
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32765
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m3): 5000
Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 0.00077
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 119

Pollutant: toluene (*HAP)

TLV (ug/m3): 188000
Maximum Hourly Emission Rate (lbs/hr): 25.23
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 3236
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Any of the following changes may be deemed a “modification” to the emissions unit and, as such, prior notification to and approval from the Hamilton County Dept. of Env. Services are required, including the possible issuance of modifications to PTI number 14-4620 and the operating permit:

a. any changes in the composition of the inks/coatings or cleanup materials, or the manufacture of new inks/coatings, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled “American Conference of Governmental Industrial Hygienists (ACGIH),” than the lowest TLV value specified in the above table;

b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table; and,

c. 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.