



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL

RE: PERMIT TO INSTALL *CORRECTED COPY 7/25/2006***
LAKE COUNTY
Application No:02-21880**

DATE: 7/25/2006

Avery Dennison Corp., Graphics Division
Kevin Cherney
250 Chester St
Painesville, OH 44077

Attached please find a corrected copy of PTI 02-21880 issued **5-4-06**. This corrected copy is being sent due to administrative processing errors and does not affect the enforceability or effective date of the Directors final action. Please note, the appearance of the corrected document may have changed due to changing software or printers (e.g., total number of pages, margins, etc.). Areas of the permit that have been substantively affected by the correction(s) are **highlighted** in the enclosed "Corrected Copy". I urge you to review these areas in relation to the issued permit document. Please replace the copy provided to you on **5-4-06** with the attached corrected Permit To Install document. *Please note:* No payment is required for processing this corrected copy.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc:



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**RE: FINAL PERMIT TO INSTALL
LAKE COUNTY
Application No: 02-21880
Fac ID: 0243001188**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
40 CFR Part 63 Subpart KK and OOOO	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

*****CORRECTED COPY 7/25/2006*****

DATE: 5/4/2006

Avery Dennison Corp., Graphics Division
Kevin Cherney
250 Chester St
Painesville, OH 44077

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

CC: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 5/4/2006
Effective Date: 5/4/2006**

FINAL PERMIT TO INSTALL 02-21880

*****CORRECTED COPY 7/25/2006*****

Application Number: 02-21880

Facility ID: 0243001188

Permit Fee: **\$0**

Name of Facility: Avery Dennison Corp., Graphics Division

Person to Contact: Kevin Cherney

Address: 250 Chester St
Painesville, OH 44077

Location of proposed air contaminant source(s) [emissions unit(s)]:
**670 Hardy Rd., Building 11
Painesville, Ohio**

Description of proposed emissions unit(s):
Ink Spray booth.

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

Director

Part I - GENERAL TERMS AND CONDITIONS

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 quarterly, i.e., 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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	2.63 tons/yr
PE	1.6 tons/yr

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

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<p>K004 - Modification of the Banner coating line with the addition of a new ink spray printing station controlled by overspray filter for particulate emissions with an outdoor stack.</p>	<p>OAC rule 3745-31-05(A)</p>	<p>VOC emissions from this emissions unit, including cleanup, shall not exceed 0.59 pound per hour on an average daily basis, and 2.63 tons per year, which includes 0.14 pounds per hour on an average daily basis and 0.63 tons per year from the ink spray print station.</p>
<p>The Banner line includes, an unwind station, a gravure adhesive coating station(banner products,-bp); a gravure print station(printed products-pp); a nip roll laminator(bp); uv curing lamps(pp); infrared; heated rolls, infra-redheating station; embossing station (pp); cooling rolls; and rewind station.</p>		<p>Particulate emissions <u>from</u> this emissions unit shall not exceed 0.36 lb/hr and 1.6 tons per year. See Section A.II.2.f.</p> <p>Particulate emissions from this emissions unit shall be controlled with an efficiency of 99.0%.</p>
<p>This permit to install supercedes permit to install number 02-18741, issued 4/27/2004.</p>	<p>OAC rule 3745-17-07(A)</p>	<p>No visible particulate emissions shall result from the operations of this emissions unit. Visible emissions shall be eliminated by the implementation and maintenance of a dry filter system or system of comparable control.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>

OAC rule 3745-17-11(A)(1) The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-21-09(G) The VOC content for the coatings employed in this emissions unit shall not exceed of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvent.

OAC rule 3745-21-09(Y) For all inks and coatings employed at either of the print stations of this emissions unit, the VOC content of the coatings and inks shall not exceed forty percent by volume, of that coating and ink, excluding water and exempt solvents or twenty-five percent VOC, by volume, of the volatile matter in the coating and ink.

40 CFR Part 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry) Gravure print station: Exempt by 40 CFR Subpart KK, Section 63.821(a)(2)(ii)(A). See Section A.II.1. of the terms and conditions of this permit.

Ink spray printing station:

Exempt by 40 CFR Subpart KK, Section 63.821(b)(2). See Section A.II.2. of the terms and conditions of this permit.

40 CFR Part 63, Subpart OOOO (National Emission Standards for the Printing, Coating, and Dyeing of Fabrics and Other Textiles Industry) Exempt by 40 CFR Subpart OOOO, Section 63.4281(c). See Section A.II.3. of the terms and conditions of this permit.

2. Additional Terms and Conditions

2.a This emissions unit operates in one of two distinctive mutually exclusive modes, manufacturing banner material or manufacturing EZ liner material.

As long as the fabric adhesive coating is 100% reactive, and exposure of non-laminated coated fabric is approximately 1 second, (line speed 200 ft/min) and the VOC content of the coating is no more than 0.0006 lbs per gallon, it will be presumed that no emissions result from the fabric adhesive coating line of this emissions unit.

- 2.b** The Banner coating line is used to coat fabric and then laminate it between sheets of vinyl film and is equipped with an infrared oven, an electric hot oil heated roll curing station, with a gravure print station, with a UV oven, all venting into the building.
- 2.c** This Chapter 31 modification is necessary based on particulate emissions, a new type of air contaminants, resulting from the installation of a new ink spray printing station, in accordance with the definition of modification from Ohio Administrative Code 3745-31-01 (VV). In addition, the annual VOC allowable is being increased to account for DeMinimis quantities (<0.1% VOC, by weight) which may occur in new formulations of UV inks.
- 2.d** UV inks with a "de minimis" amount of VOC (less than 0.1%) based on formulation data provided by the manufacturer shall not be required to conduct Method 24 testing.
- 2.e** The permittee shall maintain and use dry filters or other comparable control of overspray based on efficiency, whenever the ink spray printing station is in operation.
- 2.f** No record keeping for particulate emissions will be required by this permit because allowables are based on maximum potential emissions.
- 2.g** Organic HAPs for the purposes of this permit, shall be defined as HAPs at a concentration of 0.1% by weight or greater based on the definition from 40 CFR Part 63, Subpart OOOO.

II. Operational Restrictions

1. The permittee shall operate this emissions unit(the gravure print station) such that the sum of total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other material applied at product and packaging rotogravure work stations, including all inboard and outboard stations, in each month never exceeds five weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied at all coating stations in the emissions unit in that month, as described in Section 63.821(A) of 40 CFR Part 63, Subpart KK.
2. The permittee shall apply or employ coatings, including cleanup, in the new spray printing station that contain no organic HAPS to comply with Section 63.821(b)(2) of 40 CFR Part 63, Subpart KK.

3. As described in 40 CFR Part 63 Subpart KK, Section 63.821(b)(2), the permittee shall apply no more than 400 kg (880 lbs) for every month, of organic HAP on product and packaging rotogravure or wide-web flexographic printing presses.
4. The permittee shall employ fabric coatings in the emissions unit that contain "no organic HAPS", as defined in 40 CFR Part 63 Subpart OOOO, Section 63.4371 of the fabric coating MACT.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records as required in 40 CFR Part 63, Subpart KK, Section 63.829(f).

In order to qualify for the exemption from the MACT requirements as described in 63.821(a)(2)(ii)(A), the permittee shall maintain the following records as required in 40 CFR Part 63, Subpart KK, Section 63.829(f)(1) and (f)(2) for five years and submit to the Director upon request:

- a. the total mass of all materials including inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers applied at product and packaging rotogravure work stations in each month, including all indoor and outboard stations;
 - b. the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers applied in all coating stations in the emissions unit each month;
 - c. the ratio of total mass of all materials applied by the printing operation using product packaging rotogravure or wide web flexographic compared to the total mass of all materials used in the emissions unit, that is, $a/b \times 100 \%$; and
 - d. confirmation that this coater is "stand alone coating equipment" as defined by the rule.
2. Any calculations used to determine compliance shall be maintained at the facility and made available to the Director or his representative, upon request, during normal business hours.
 3. The permittee shall collect and record the following information daily for all coatings and inks employed in this emissions unit:
 - a. the name and identification number of each coating and ink employed or applied;
 - b. for coatings that are not subject to OAC rule 3745-21-09(Y)(1), the VOC content, in pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents; and

- c. for coatings and inks that are subject to OAC rule 3745-21-09(Y)(1), the percent VOC by volume of the coating or ink, excluding water and exempt solvents, and the percent VOC by volume of the volatile matter in the coating or ink.
4. The permittee shall collect and record the following information daily for all coatings and inks employed in this emissions unit:
 - a. the total VOC emissions from the gravure print station, in lbs;
 - b. the total VOC emissions from the ink spray print station, in lbs;
 - c. the total VOC emission from cleanup of the gravure print station, in lbs;
 - d. the total VOC emissions from the cleanup of the ink spray print station, in lbs;
 - e. the total VOC emission from cleanup of the fabric coating line, in lbs;
 - f. the total VOC emissions from this emission unit, in lbs and tons;
 - g. the total operating hours of the emissions unit; and
 - h. the daily average emissions of VOC, including cleanup from the emissions unit, in lbs per hour.
5. The permittee shall collect and record the following information daily for all coatings and inks employed in every product and packaging rotogravure and/or every wide-web flexographic printing press on the F-3 coater.
 - a. the total VOC emissions from the rotogravure print station on the F3 coater, in lbs;
 - b. the total VOC emissions from cleanup of the rotogravure print station on the F3 coater, in lbs.
6. The permittee shall calculate the following summations, monthly.

the monthly summation of daily organic HAP emissions from all product and packaging rotogravure or wide-web flexographic printing presses, in lbs (4a +4c. + 5a +5b.).
7. The permittee shall record and sum total annual VOC emissions in tons per year from this emissions unit.
- 8.. The permittee shall record any instance where fabric coatings used in the emissions unit contained "organic HAPS" as defined in 40 CFR Part 63 Subpart OOOO, Section 63.4371.
9. The permittee shall record any instance where VOC content of fabric coating employed in this emissions unit is greater than or equal to 0.1 %, by weight.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Northeast District of the Ohio EPA) in writing of any daily record showing that the VOC content of any coating, that is not subject to OAC rule 3745-21-09(Y)(1), exceeded the applicable limitation of 2.9 pounds of VOC per gallon of coating applied, excluding water and exempt solvents.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

2. The permittee shall notify the Director (the Northeast District of the Ohio EPA) in writing of any daily record showing that the VOC content of any coating or ink, that is subject to OAC rule 3745-21-09(Y)(1), exceeded both applicable limitations of 40% VOC by volume of the coating or ink, excluding water and exempt solvents, and 25% VOC by volume of the volatile matter in the coating or ink.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

3. The permittee shall notify the Director (the Northeast District of the Ohio EPA) in writing of any daily record showing that the emission rate of VOCs, including cleanup, on an average daily basis, exceeded the applicable limitation of 0.59 lb per hour.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the 5% limit (the ratio of the total mass of all materials applied by the printing operation using product and packaging rotogravure work stations or wide web flexographic, including all inboard and outboard stations, compared to the total mass of all materials applied in the emissions unit). This 5% limit exempts this printing operation from the requirements of the MACT standard as described in 40 CFR Part 63, Subpart KK, Section 63.821(a)(2)(ii)(A).

5. The permittee shall report any instance where fabric coatings used in the emissions unit contained "organic HAPS", as defined in 40 CFR Part 63 Subpart OOOO, Section 63.4371..

6. The permittee shall submit deviation (excursion) reports that identify any month during which the application of organic HAP exceeds 400 kg (880 lbs) for all product and packaging rotogravure and wide-web flexographic printing stations.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

7. If required, and upon commencing operation of the newly installed ink spray print station, the permittee shall submit an Initial Notification Report as described in 40 CFR Part 63 Subpart A, Section 63.9 which certifies whether or not the permittee is subject to the promulgated printing MACT standard MACT (40 CFR Part 63, Subpart KK) . If the permittee is subject to the final printing MACT standard, the following information shall also be included in the Initial Notification Report:
 - a. the name and mailing address of the permittee;
 - b. the physical location of the source if it is different from the mailing address;
 - c. identification of the relevant MACT standard and the permittee's compliance date;
 - d. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - e. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

8. If applicable, and upon commencing operation of the newly installed ink spray print station, and following completion of any required compliance demonstration activity specified in the 40 CFR Part 63 Subpart KK, the permittee shall submit a notification of compliance status that contains the following information:
 - a. the methods used to determine compliance;
 - b. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
 - d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Part 63 Subpart JJJJ;
 - e. an analysis demonstrating whether the affected source is a major source or an area source;

- f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
- g. a statement of whether or not the permittee has complied with the requirements of 40 CFR Part 63 Subpart JJJJ.

V. Testing Requirements

1. USEPA Method 24 or Method 24A shall be used in accordance with OAC rule 3745-21-04(B)(5), to determine the VOC contents of all coatings and inks. If pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternate analytical procedures or alternate precisions statements for Method 24 and/or Method 24A.

Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the cleanup materials.

2. Emission Limitation

For the coatings employed in this emissions unit that are not subject to OAC rule 3745-21-09(Y)(1), VOC content shall not exceed of 2.9 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvent.

Applicable Compliance Method

Compliance with the above emission limitation shall be based on the record keeping in Section A.III.3 of these terms and conditions.

3. Emission Limitation

For all inks and coatings employed at the print station of this emissions unit, [that is those subject to OAC rule 3745-21-09(Y)(1)], 40% VOC by volume of the coating or ink, excluding water and exempt solvents or 25% VOC by volume of the volatile matter in the coating or ink.

Applicable Compliance Method

Compliance with the above emission limitation shall be based on the record keeping in Section A.III.3 of these terms and conditions.

4. Emission Limitation

VOC emissions from this emissions unit, including cleanup, shall not exceed 0.59 pound per hour, on an average daily basis, and 2.63 tons per year.

Applicable Compliance Method

Compliance will be determined based on the record keeping in Section III.4 and 5 of these terms and conditions.

5. Emission Limitation

No visible emissions

Applicable Compliance Method

If required, compliance with the visible particulate limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None