

Facility ID: 1431370758 Issuance type: Title V Proposed Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions unit(s) are located at this facility:

Z002 Solvent Cold Cleaner
Z003 Baler/Cyclone

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

- [Go to Part III for Emissions Unit K001](#)
- [Go to Part III for Emissions Unit K002](#)
- [Go to Part III for Emissions Unit K003](#)
- [Go to Part III for Emissions Unit K004](#)
- [Go to Part III for Emissions Unit K005](#)

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431370758 Emissions Unit ID: K001 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
# 75 Zerand Flexographic Printing Press	40 CFR 63 Subpart KK OAC 3745-21-09(Y)(1)(a)	See T&C A.II.1. See A.I.2.

2. Additional Terms and Conditions

- a. The volatile organic compound content of the coatings and inks employed in this emissions unit shall not exceed the following:
 - (a)
 - i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
 - ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink.

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II. Operational Restrictions

1. Should HAP usage for the facility exceed either:
 - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820 (a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the Hamilton County Department of Environmental Services that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating.
 - b. The percent VOC by volume of the coating and ink, as applied, excluding water and exempt solvents,

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

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage for each HAP for all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
 - j. the total combined HAPs usage for all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
 - k. the total individual HAP emissions for each HAP for all emissions units at the facility other than the printing lines (K001, K002, K003, K004, and K005), in tons;
 - l. the total combined HAPs emissions for all emissions units at the facility other than the printing lines (K001, K002, K003, K004, and K005), in tons;
 - m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;
 - n. the total combined HAPs emissions for all emissions units at the facility, in tons;
 - o. the total individual HAP emissions for each HAP for all emissions units at the facility for the rolling 12-month period, in tons; and
 - p. the total combined HAPs emissions for all emissions units at the facility for the rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis.
None

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports for any exceedence of the rolling, 12-month, usage limitations in A.II.1.
3. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in A.III.2.i through A.III.2.p for each calendar month and the supporting calculations. Each report shall be submitted by January 31 of each year and cover the previous calendar year's operation.

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V. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with HAP usage limits in section A.I.2.a shall be demonstrated by the record keeping requirements in section A.III.2 of this permit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1431370758 Emissions Unit ID: K001 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
# 75 Zerand Flexographic Printing Press		
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431370758 Emissions Unit ID: K002 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
# 76 Zerand Flexographic Printing Press	40 CFR 63 Subpart KK OAC 3745-21-09(Y)(1)(a)	See T&C A.II.1. See A.I.2.

2. Additional Terms and Conditions

- a. The volatile organic compound content of the coatings and inks employed in this emissions unit shall not exceed the following:
 - (a)
 - i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
 - ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink.

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II. Operational Restrictions

1. Should HAP usage for the facility exceed either:
 - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820 (a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the Hamilton County Department of Environmental Services that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating.
 - b. The percent VOC by volume of the coating and ink, as applied, excluding water and exempt solvents, and the percent VOC by volume of the volatile matter in the coating and ink, as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
2. The permittee shall collect and record the following information on a monthly basis, for the entire facility:

- a. the name and identification number of each coating, as applied;
- b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
- c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (b));
- d. the number of gallons of each coating employed;
- e. the name and identification of each cleanup material employed;
- f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (f));
- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP usage for each HAP for all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
- j. the total combined HAPs usage for all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
- k. the total individual HAP emissions for each HAP for all emissions units at the facility other than the printing lines (K001, K002, K003, K004, and K005), in tons;
- l. the total combined HAPs emissions for all emissions units at the facility other than the printing lines (K001, K002, K003, K004, and K005), in tons;
- m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;
- n. the total combined HAPs emissions for all emissions units at the facility, in tons;
- o. the total individual HAP emissions for each HAP for all emissions units at the facility for the rolling 12-month period, in tons; and
- p. the total combined HAPs emissions for all emissions units at the facility for the rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis.
None

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports for any exceedence of the rolling, 12-month, usage limitations in A.II.1.
3. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in A.III.2.i through A.III.2.p for each calendar month and the supporting calculations. Each report shall be submitted by January 31 of each year and cover the previous calendar year's operation.

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V. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Compliance with HAP usage limits in section A.I.2.a shall be demonstrated by the record keeping requirements in section A.III.2 of this permit.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1431370758 Emissions Unit ID: K002 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
# 76 Zerand Flexographic Printing Press		
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1431370758 Emissions Unit ID: K003 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
# 77 Zerand Flexographic Printing Press	40 CFR 63 Subpart KK OAC 3745-21-09(Y)(1)(a)	See T&C A.II.1. See A.I.2.

2. Additional Terms and Conditions

- a. The volatile organic compound content of the coatings and inks employed in this emissions unit shall not exceed the following:
 - (a)
 - i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
 - ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink.

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II. Operational Restrictions

1. Should HAP usage for the facility exceed either:
 - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820 (a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the Hamilton County Department of Environmental Services that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating.
 - b. The percent VOC by volume of the coating and ink, as applied, excluding water and exempt solvents, and the percent VOC by volume of the volatile matter in the coating and ink, as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
2. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (b));

- d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage for each HAP for all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
 - j. the total combined HAPs usage for all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
 - k. the total individual HAP emissions for each HAP for all emissions units at the facility other than the printing lines (K001, K002, K003, K004, and K005), in tons;
 - l. the total combined HAPs emissions for all emissions units at the facility other than the printing lines (K001, K002, K003, K004, and K005), in tons;
 - m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;
 - n. the total combined HAPs emissions for all emissions units at the facility, in tons;
 - o. the total individual HAP emissions for each HAP for all emissions units at the facility for the rolling 12-month period, in tons; and
 - p. the total combined HAPs emissions for all emissions units at the facility for the rolling 12-month period, in tons.
- A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis.
None

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports for any exceedence of the rolling, 12-month, usage limitations in A.II.1.
3. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in A.III.2.i through A.III.2.p for each calendar month and the supporting calculations. Each report shall be submitted by January 31 of each year and cover the previous calendar year's operation.

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V. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Compliance with HAP usage limits in section A.I.2.a shall be demonstrated by the record keeping requirements in section A.III.2 of this permit.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1431370758 Emissions Unit ID: K003 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
# 77 Zerand Flexographic Printing Press		
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1431370758 Emissions Unit ID: K004 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
8-Color Rotogravure Press	40 CFR 63 Subpart KK OAC 3745-21-09(Y)(1)(a)	See T&C A.II.1. See A.I.2.

2. **Additional Terms and Conditions**

- a. The volatile organic compound content of the coatings and inks employed in this emissions unit shall not exceed the following:
- (a)
- i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
 - ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink.

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II. **Operational Restrictions**

1. Should HAP usage for the facility exceed either:
- a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820 (a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the Hamilton County Department of Environmental Services that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

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

1. The permittee shall collect and record the following information each month for the line:
- a. The name and identification number of each coating.
 - b. The percent VOC by volume of the coating and ink, as applied, excluding water and exempt solvents, and the percent VOC by volume of the volatile matter in the coating and ink, as applied.
- (This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
2. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
- a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (f));

- h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage for each HAP for all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
 - j. the total combined HAPs usage for all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
 - k. the total individual HAP emissions for each HAP for all emissions units at the facility other than the printing lines (K001, K002, K003, K004, and K005), in tons;
 - l. the total combined HAPs emissions for all emissions units at the facility other than the printing lines (K001, K002, K003, K004, and K005), in tons;
 - m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;
 - n. the total combined HAPs emissions for all emissions units at the facility, in tons;
 - o. the total individual HAP emissions for each HAP for all emissions units at the facility for the rolling 12-month period, in tons; and
 - p. the total combined HAPs emissions for all emissions units at the facility for the rolling 12-month period, in tons.
- A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis.
None

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports for any exceedence of the rolling, 12-month, usage limitations in A.II.1.
3. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in A.III.2.i through A.III.2.p for each calendar month and the supporting calculations. Each report shall be submitted by January 31 of each year and cover the previous calendar year's operation.

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V. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Compliance with HAP usage limits in section A.I.2.a shall be demonstrated by the record keeping requirements in section A.III.2 of this permit.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1431370758 Emissions Unit ID: K004 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
8-Color Rotogravure Press	OAC 3745-31-05 (PTI 14-2033)	Emissions of VOC from this emissions unit shall not exceed 420 lbs/day* or 51.39 TPY. The maximum VOC content of coatings employed in this emissions unit shall not exceed 18 percent VOC by volume of the volatile matter in each coating, as applied.**

2. Additional Terms and Conditions

- a. * The daily VOC emission limit is based upon potential to emit for this emissions unit. Therefore, no daily record keeping, deviation reporting, or compliance method calculations are required.
- b. ** Compliance with the VOC content limit shall be demonstrated by the record keeping requirements in section A.III.1. of this permit.

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II. Operational Restrictions

1. The total gallons of coatings employed in this emissions unit shall not exceed 644 gallons per day or 160,905 gallons per year, as applied.

The daily coating usage limit is based upon the maximum capacity for this emissions unit. Therefore, no daily record keeping, deviation reporting, or compliance method calculations are required.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon.
 - d. The total monthly VOC emission rate for all coatings and cleanup materials employed, recorded in tons per month (the summation of line b multiplied by line c for all coatings and cleanup material employed that month divided by 2000).
 - e. The year-to-date VOC emissions total, in TPY (the summation of line d for all months during the calendar year).
 - f. The year-to-date number of gallons of coatings employed (the summation of line b for all months during the calendar year)

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

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for any exceedence of the emission limitations, usage limitations, or VOC content restriction specified in sections B.I.1. and B.II.1. of this permit.
2. The permittee shall also submit annual reports which specify the total VOC emissions and total coating usage for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
The permittee shall also submit annual reports which specify the total VOC emissions and total coating usage for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitations, usage limitations, and VOC content restriction listed in B.I.1 and B.II.1 shall be demonstrated by the record keeping requirements in sections A.III and B.III. of this permit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1431370758 Emissions Unit ID: K005 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
10-Color Flexographic Press with paper coater	40 CFR 63 Subpart KK OAC 3745-21-09(Y)(1)(a)	See T&C A.II.1. See A.I.2.

2. **Additional Terms and Conditions**

- a. The volatile organic compound content of the coatings and inks employed in this emissions unit shall not exceed the following:
 - (a)
 - i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
 - ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink.

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II. **Operational Restrictions**

1. Should HAP usage for the facility exceed either:
 - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820 (a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the Hamilton County Department of Environmental Services that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

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

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating.
 - b. The percent VOC by volume of the coating and ink, as applied, excluding water and exempt solvents, and the percent VOC by volume of the volatile matter in the coating and ink, as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
2. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage for each HAP for all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
 - j. the total combined HAPs usage for all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
 - k. the total individual HAP emissions for each HAP for all emissions units at the facility other than the printing lines (K001, K002, K003, K004, and K005), in tons;
 - l. the total combined HAPs emissions for all emissions units at the facility other than the printing lines (K001, K002, K003, K004, and K005), in tons;
 - m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;
 - n. the total combined HAPs emissions for all emissions units at the facility, in tons;
 - o. the total individual HAP emissions for each HAP for all emissions units at the facility for the rolling 12-month period, in tons; and
 - p. the total combined HAPs emissions for all emissions units at the facility for the rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis.
None

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IV. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports for any exceedence of the rolling, 12-month, usage limitations in A.II.1.
3. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in A.III.2.i through A.III.2.p for each calendar month and the supporting calculations. Each report shall be submitted by January 31 of each year and cover the previous calendar year's operation.

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V. **Testing Requirements**

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Compliance with HAP usage limits in section A.I.2.a shall be demonstrated by the record keeping requirements in section A.III.2 of this permit.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1431370758 Emissions Unit ID: K005 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
10-Color Flexographic Press with paper coater	OAC 3745-31-05 (PTI 14-2033)	Emissions of VOC from this emissions unit shall not exceed 473 lbs/day* or 32.4 TPY. The maximum VOC content of coatings employed in this emissions unit shall not exceed 21 percent VOC by volume of the volatile matter in each coating, as applied.**

2. **Additional Terms and Conditions**
 - a. * The daily VOC emission limit is based upon potential to emit for this emissions unit. Therefore, no daily record keeping, deviation reporting, or compliance method calculations are required.
 - b. ** Compliance with the VOC content limit shall be demonstrated by the record keeping requirements in section A.III.1. of this permit.

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II. Operational Restrictions

1. The total gallons of coatings employed in this emissions unit shall not exceed 11,773 gallons per month or 141,275 gallons per year, as applied.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon.

d. The total monthly VOC emission rate for all coatings and cleanup materials employed, recorded in tons per month (the summation of line b multiplied by line c for all coatings and cleanup material employed that month divided by 2000).

e. The year-to-date VOC emissions total, in TPY (the summation of line d for all months during the calendar year).

f. The year-to-date number of gallons of coatings employed (the summation of line b for all months during the calendar year)

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

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for any exceedence of the emission limitations, usage limitations, or VOC content restriction specified in sections B.I.1. and B.II.1. of this permit.
2. The permittee shall also submit annual reports which specify the total VOC emissions and total coating usage for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance with the emission limitations, usage limitations, and VOC content restriction listed in B.I.1 and B.II.1 shall be demonstrated by the record keeping requirements in sections A.III and B.III. of this permit.

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VI. Miscellaneous Requirements

1. None