



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
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Columbus, OH 43215

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Mailing Address:

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

**RE: FINAL PERMIT TO INSTALL
PORTAGE COUNTY
Application No: 16-02376
Fac ID: 1667040015**

DATE: 12/21/2004

Schneller Inc
Mark Stewart
6019 Powdermill Road
Kent, OH 44240

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
40 CFR Part 63, subparts KK and JJJJ	MACT
40 CFR Part 60, subpart FFF	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

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

ARAQMD



Permit To Install
Terms and Conditions

Issue Date: 12/21/2004
Effective Date: 12/21/2004

FINAL PERMIT TO INSTALL 16-02376

Application Number: 16-02376
Facility ID: 1667040015
Permit Fee: **\$200**
Name of Facility: Schneller Inc
Person to Contact: Mark Stewart
Address: 6019 Powdermill Road
Kent, OH 44240

Location of proposed air contaminant source(s) [emissions unit(s)]:
6019 Powdermill Rd
Kent, Ohio

Description of proposed emissions unit(s):
Modification to Emissions Unit K007, Increase in Allowable Emissions. Replaces PTI 16-02286 Issued Final 6/5/03.

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. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or

condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

12. 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.

B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. 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.

6. 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.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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	12.0

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - 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>
K007 - UV Coater - equipment consists of a coating station and a rotogravure printer in line with a UV curing station (the terms and conditions of this permit supercede the terms and conditions in PTI 16-02286 issued 6/5/2003).	OAC rule 3745-31-05(A)(3)	Volatile organic compounds (VOC) shall not exceed 2.5 pounds of per hour for coatings employed and 12.0 tons of VOC per year for coatings and cleanup material employed and shall have at least an 95% overall control efficiency for VOC. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, subpart FFF, 40 CFR Part 63, subpart KK, and 40 CFR Part 63, subpart JJJJ.
	OAC rule 3745-21-09(B)(6)	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(H)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, subpart FFF	On and after the date on which the performance test required by section 60.8 of 40 CFR Part 60, subpart A has been completed, each owner or operator subject to this subpart shall use inks with a weighted average VOC content less than 1.0 kilogram VOC per kilogram ink solids at each affected facility.

	<p>[Authority for term: section 60.582(a)(1) of 40 CFR Part 60, subpart FFF]</p> <p>The affected facility to which the provisions of this subpart apply is each rotogravure printing line used to print or coat flexible vinyl or urethane products. [Authority for term: section 60.580(a) of 40 CFR Part 60, subpart FFF]</p>
40 CFR Part 63, subpart KK	<p>This emissions unit shall demonstrate compliance with 40 CFR Part 63, Subpart KK by meeting the requirements of section 63.821(a)(2)(ii) of 40 CFR Part 63, subpart KK as outlined in sections A.I.2.a and A.III.7 below.</p>
40 CFR Part 63, subpart JJJJ	<p>You must limit organic HAP emissions to no more than 5 percent of the organic HAP applied for each month (95 percent reduction).</p> <p>[Authority for term: section 63.3320(b)(1) of 40 CFR Part 63, subpart JJJJ]</p> <p>You must demonstrate compliance with this subpart by following the procedures in section A.V.7.e of these terms and conditions.</p> <p>[Authority for term: section 63.3320(c) of 40 CFR Part 63, subpart JJJJ]</p> <p>The compliance date for existing affected sources in 40 CFR Part 63, subpart JJJJ is December 5, 2005. You must complete any performance test required in sections A.V.5 and A.V.6 of these terms and conditions within the time limits specified in section 63.7(a)(2) of 40 CFR Part 63, subpart A.</p> <p>[Authority for term: section 63.3330(a) of 40 CFR Part 63, subpart JJJJ].</p>

This emissions unit to which the provisions of this subpart apply to web coating lines located at a major source of HAP as defined in section 63.2 of 40 CFR Part 63, subpart A [Authority for term: section 63.3300 of 40 CFR Part 63, subpart JJJJ]

2. Additional Terms and Conditions

2.a The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print 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 by the press in that month, including all inboard and outboard stations

[Authority for term: section 63.821(a)(2)(ii)(A) of 40 CFR Part 63, Subpart KK]

2.b The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2.c The hourly VOC emission limitation regulated per OAC rule 3745-31-05(A)(3) is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water or a minimum facial velocity of 200 feet per minute as confirmed during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

This operational restriction does not apply during time periods when an individual is entering or exiting the permanent total enclosure.

3. For any web coating line or group of web coating lines for which you use add-on control devices, unless you use a solvent recovery system and conduct a liquid-liquid material balance, you must meet the following operating limits specified in Table 1 of 40 CFR Part 63, subpart JJJJ: for each thermal incinerator, the average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to section A.V.5.c.i of these terms and conditions and for each emission capture system, submit a monitoring plan to the Administrator that identifies operating parameters to be monitored according to section A.III.10 of these terms and conditions. These operating limits apply to emission capture systems and control devices, and you must establish the operating limits during the performance test according to the requirements in section A.V.5.c of these terms and conditions. You must meet the operating limits at all times after you establish them.

[Authority for term: section 63.3321(a) and Table 1 of 40 CFR Part 63, subpart JJJJ]

III. Monitoring and/or Recordkeeping 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, as applied;
 - b. the linear yard of material processed;
 - c. the VOC emissions from the coatings employed, in tons (i.e., (b) times the derived pound(s) of VOC per linear yard of material processed emission factor*, then divided by 2000 pounds per ton);
 - d. the name and identification number of each cleanup material employed;
 - e. the number of gallons of each cleanup material employed;
 - f. the VOC content of each cleanup material, in pounds per gallon;
 - g. the VOC emissions from all cleanup materials employed, in tons (i.e., (e) times (f), then divided by 2000 pounds per ton);
 - h. the total uncontrolled VOC emissions from all coatings and cleanup materials employed, in tons (i.e., (c) plus (g)); and
 - i. the calculated total controlled VOC emission rate from all coatings and cleanup materials employed, in tons (the controlled emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance).

*The emission factors were developed per the "UV Coater Emission Experiment" documents dated June 14, 2002 and May 11, 2004.

2. If any of the operating parameters established in the "UV Coater Emissions Experiment" documents date either June 14, 2002 or May 11, 2004 are to change, the permittee shall reevaluate the emission factor prior to implementing the process changes in order to verify compliance with the hourly emission limitation for VOC. The reevaluation of the emission factor shall be kept on site and available for inspection during regular office hours. If at any point it is determined that based on the potential to emit calculation for VOC that the hourly emission limitation could be exceeded, the permittee shall either apply for and obtain a permit to install modification or develop daily record keeping to verify the actual average hourly emissions of VOC do not exceed the allowable hourly emission limitation for VOC.
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
- b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-21-09(B)(3)(I)]

4. The permittee shall install, maintain, and operate monitoring devices which simultaneously measure the pressure inside and outside the permanent total enclosure or which measure the facial velocity through each natural draft opening. The monitoring devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. the difference in pressure between the permanent total enclosure and the surrounding area(s) or the facial velocity for each natural draft opening; and
- b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

5. To demonstrate compliance with section 60.582(a)(1) of 40 CFR Part 60, subpart FFF, the owner or operator of an affected facility shall determine the weighted average VOC content of the inks according to the following procedures:

- a. Determine and record the VOC content and amount of each ink used at the print head, including the VOC content and amount of diluent solvent, for any time periods when VOC emission control equipment is not used.
- b. Compute the weighted average VOC content by the following equation:

$$G = \frac{[\text{the summation of } (W_{oi} \times M_{ci}) \text{ from } i=1 \text{ to } n + \text{the summation of } (W_{oj} \times M_{dj}) \text{ from } j=1 \text{ to } m]}{[\text{the summation of } (M_{ci} \times W_{si}) \text{ from } i=1 \text{ to } n]}$$

where:

G = the weighted average mass of VOC per mass of ink solids applied, in kilograms per kilogram

W_{oi} = the weight fraction of VOC in each ink (i) used in the time period as determined from Reference Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.

M_{ci} = the total mass of each ink (i) applied in the time period as determined from plant records, in kilograms.

W_{oj} = the weight fraction of VOC in each dilution solvent (j) added at the print line in the time period determined from Reference Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.

M_{dj} = the total mass of each dilution solvent (j) added at the print line in the time period determined from plant records, in kilograms.

W_{si} = means the weight fraction of solids in each ink (i) used in the time period as determined from Reference Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.

- c. The weighted average VOC content of the inks shall be calculated over a period that does not exceed one calendar month, or four consecutive weeks. A facility that uses an accounting system based on quarters consisting of two 28 calendar day periods and one 35 calendar day period may use an averaging period of 35 calendar days four times per year, provided the use of such an accounting system is documented in the initial performance test.
- d. Each determination of the weighted average VOC content shall constitute a performance test for any period when VOC emission control equipment is not used. Results of the initial performance test must be reported to the Administrator. Method 24 or ink manufacturers' formulation data along with plant blending records (if plant blending is done) may be used

to determine VOC content. The Administrator may require the use of Method 24 if there is a question concerning the accuracy of the ink manufacturer's data or plant blending records.

- e. If, during the time periods when emission control equipment is not used, all inks used contain less than 1.0 kilogram VOC per kilogram ink solids, the owner or operator is not required to calculate the weighted average VOC content, but must verify and record the VOC content of each ink (including any added dilution solvent) used as determined by Method 24, ink manufacturers' formulation data, or plant blending records.

[Authority for term: section 60.583(b) and section 60.581(b) of 40 CFR Part 60, subpart FFF]

- 6. To demonstrate compliance with section 60.582(a)(1) of 40 CFR Part 60, subpart FFF, the owner or operator may determine the weighted average VOC content using an inventory system.
 - a. The inventory system shall accurately account to the nearest kilogram for the VOC content of all inks and dilution solvent used, recycled, and discarded for each affected facility during the averaging period. Separate records must be kept for each affected facility.
 - b. To determine VOC content of inks and dilution solvent used or recycled, Method 24 or ink manufacturers' formulation data must be used in combination with plant blending records (if plant blending is done) or inventory records or purchase records for new inks or dilution solvent.
 - c. For inks to be discarded, only Method 24 shall be used to determine the VOC content. Inks to be discarded may be combined prior to measurement of volume or weight and testing by Method 24.
 - d. The Administrator may require the use of Method 24 if there is a question concerning the accuracy of the ink manufacturer's data or plant records.
 - e. The Administrator shall approve the inventory system of accounting for VOC content prior to the initial performance test.

[Authority for term: section 60.583(c) of 40 CFR Part 60, subpart FFF]

- 7. The owner or operator choosing to exclude from an affected source, a product and packaging rotogravure or wide-web flexographic press which meets the limits and criteria of section A.I.2.a of these terms and conditions shall maintain the records specified in paragraphs 7.a and 7.b below for five years and submit them to the Administrator upon request:
 - a. The total mass of each material applied each month on the press, including all inboard and outboard stations, and
 - b. The total mass of each material applied each month on the press by product and packaging rotogravure or wide-web flexographic printing operations.

[Authority for term: section 63.829(f) of 40 CFR Part 63, Subpart KK]

8. Following the date on which the initial performance test of a control device is completed to demonstrate continuing compliance with the standards, you must monitor and inspect each capture system and each control device used to comply with section 63.3320 of 40 CFR Part 63, subpart JJJJ. You must install and operate the monitoring equipment as specified in section A.III.10 of these terms and conditions.

[Authority for term: section 63.3350(b) of 40 CFR Part 63, subpart JJJJ]

9. If you are using a control device to comply with the emission standards in section 63.3320 of 40 CFR Part 63, subpart JJJJ, you must install, operate, and maintain each continuous parameter monitoring system (CPMS) specified in paragraph 9.i below and section A.III.10 of these terms and conditions according to the requirements in paragraphs 9.a through 9.h below.
 - a. Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.
 - b. You must have valid data from at least 90 percent of the hours during which the process operated.
 - c. You must determine the hourly average of all recorded readings according to paragraphs 9.c.i and 9.c.ii below.
 - i. To calculate a valid hourly value, you must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.
 - ii. Provided all of the readings recorded in accordance with paragraph 9.c above clearly demonstrate continuous compliance with the standard that applies to you, then you are not required to determine the hourly average of all recorded readings.
 - d. You must determine the rolling 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, you must have at least two of three of the hourly averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods).
 - e. You must record the results of each inspection, calibration, and validation check of the CPMS.
 - f. At all times, you must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

- g. Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), you must conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in section A.V.7.e of these terms and conditions. You must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- h. Any averaging period for which you do not have valid monitoring data and such data are required constitutes a deviation, and you must notify the Administrator in accordance with section A.IV.10 of these terms and conditions.
- i. If you are using an oxidizer to comply with the emission standards, you must comply with paragraphs 9.i.i through 9.i.ii below.
 - i. Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment whether you choose not to perform the calibration or the equipment cannot be calibrated properly.
 - ii. For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of plus or minus 1 percent of the temperature being monitored in degrees Celsius, or plus or minus 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.

[Authority for term: section 63.3350(e) of 40 CFR Part 63, subpart JJJJ]

- 10. If you are complying with the emission standards in section 63.3320 of 40 CFR Part 63, subpart JJJJ through the use of a capture system and control device for one or more web coating lines, you must develop a site-specific monitoring plan containing the information specified in paragraphs 10.a and 10.b below for these capture systems. You must monitor the capture system in accordance with paragraph 10.c below. You must make the monitoring plan available for inspection by the permitting authority upon request.
 - a. The monitoring plan must:
 - i. Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained; and

- ii. Explain why this parameter is appropriate for demonstrating ongoing compliance; and
 - iii. Identify the specific monitoring procedures.
- b. The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in section 63.3320 of 40 CFR Part 63, subpart JJJJ. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.
- c. You must conduct all capture system monitoring in accordance with the plan.
- d. Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.
- e. You must review and update the capture system monitoring plan at least annually.

[Authority for term: section 63.3350(f) of 40 CFR Part 63, subpart JJJJ]

11. Each owner or operator of an affected source subject to 40 CFR Part 63, subpart JJJJ must maintain the records specified in paragraphs 11.a and 11.b below on a monthly basis in accordance with the requirements of section 63.10(b)(1) of 40 CFR Part 63, subpart A:
- a. Records specified in section 63.10(b)(2) of 40 CFR Part 63, subpart A of all measurements needed to demonstrate compliance with this standard, including:
 - i. Control device and capture system operating parameter data in accordance with the requirements of sections A.III.9 and A.III.10 of these terms and conditions; and
 - ii. Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of sections A.V.5 and A.V.6 of these terms and conditions.
 - b. Records specified in section 63.10(c) of 40 CFR Part 63, subpart A for each CMS operated by the owner or operator in accordance with the requirements of section A.III.8 of these terms and conditions.

[Authority for term: section 63.3410(a) of 40 CFR Part 63, subpart JJJJ]

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

- b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, does not comply with the temperature limitation specified above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(B)(3)(m)]

2. A summary report specified in section 63.10(e)(3) of 40 CFR Part 63, subpart A shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by section 63.10(e)(3)(i) of 40 CFR Part 63, subpart A, the summary report shall include, exceedances of the criterion of section A.I.2.a of these terms and conditions.

[Authority for term: section 63.830(b)(6) of 40 CFR Part 63, Subpart KK]

3. For all affected facilities subject to compliance with section 60.582 of 40 CFR Part 60, subpart FFF, the performance test data and results from the performance test shall be submitted to the Administrator as specified in section 60.8(a) of 40 CFR Part 60, subpart A.

[Authority for term: section 60.585(a) of 40 CFR Part 60, Subpart FFF]

4. The owner or operator of each affected facility shall submit semiannual reports to the Administrator of occurrences of the following:
 - a. Exceedances of the weighted average VOC content specified in section 60.582(a)(1) of 40 CFR Part 60, subpart FFF.

The reports required under this paragraph shall be postmarked within 30 days following the end of the second and fourth calendar quarters.

[Authority for term: sections 60.585(b) and 60.585(c) of 40 CFR Part 60, Subpart FFF]

5. The requirements of section 60.585 of 40 CFR Part 60, subpart FFF remain in force until and unless the Agency, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with section 60.585 of 40 CFR Part 60, subpart FFF, provided that they comply with requirements established by the State.

[Authority for term: section 60.585(d) of 40 CFR Part 60, subpart FFF]

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

Schneller Inc

PTI Application: 16-02376

Issued: 12/21/2004

Facility ID: 1667040015

Emissions Unit ID: K007

- 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); and
- c. actual start-up date (within 15 days after such date).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and

Akron Regional Air Quality Management District
146 South High Street, Suite 904
Akron, OH 44308

7. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at either the required differential pressure or the required facial velocity through any of the natural draft opening specified above. These reports are due in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.
8. Each owner or operator of an affected source subject to 40 CFR Part 63, subpart JJJJ must submit the reports specified in section A.IV.9 through A.IV.14 of these terms and conditions to the Administrator.

[Authority for term: section 63.3400(a) of 40 CFR Part 63, subpart JJJJ]

9. You must submit an initial notification as required by section 63.9(b) of 40 CFR Part 63, subpart A.
 - a. Initial notification for existing affected sources must be submitted no later than 1 year before December 5, 2005.
 - b. Initial notification for new and reconstructed affected sources must be submitted as required by section 63.9(b) of 40 CFR Part 63, subpart A.
 - c. For the purpose of 40 CFR Part 63, subpart JJJJ, a title V or part 70 permit application may be used in lieu of the initial notification required under section 63.9(b) of 40 CFR Part 63, subpart A, provided the same information is contained in the permit application as required by section 63.9(b) of 40 CFR Part 63, subpart A and the State to which the permit application has been submitted has an approved operating permit program under part 70 of

this chapter and has received delegation of authority from the EPA to implement and enforce 40 CFR Part 63, subpart JJJJ.

- d. If you are using a permit application in lieu of an initial notification in accordance with paragraph 9.c above, the permit application must be submitted by the same due date specified for the initial notification.

[Authority for term: section 63.3400(b) of 40 CFR Part 63, subpart JJJJ]

- 10. You must submit a semiannual compliance report according to paragraphs 10.a and 10.b below.
 - a. Compliance report dates.
 - i. The first compliance report must cover the period beginning on December 5, 2005 and ending on December 31.
 - ii. The first compliance report must be postmarked or delivered no later than January 31.
 - iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - iv. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - v. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to section 70.6(a)(3)(iii)(A) of 40 CFR Part

70 or section 71.6(a)(3)(iii)(A) of 40 CFR Part 71, you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs 10.a.i through 10.a.iv above.

- b. The compliance report must contain the information in paragraphs 10.b.i through 10.b.vi below:
 - i. Company name and address.
 - ii. Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.
 - iii. Date of report and beginning and ending dates of the reporting period.
 - iv. If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
 - v. For each deviation from an emission limitation (emission limit or operating limit) that applies to you and that occurs at an affected source where you are not using a CEMS to comply with the emission limitations in 40 CFR Part 63, subpart JJJJ, the compliance report must contain the information in paragraphs 10.b.i through 10.b.iii above, and:
 - (a) The total operating time of each affected source during the reporting period.
 - (b) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.
 - (c) Information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

[Authority for term: section 63.3400(c) of 40 CFR Part 63, subpart JJJJ]

- 11. You must submit a Notification of Performance Tests as specified in sections 63.7 and 63.9(e) of 40 CFR Part 63, subpart A if you are complying with the emission standard using a control device and you are required to conduct a performance test of the control device. This notification and the site-specific test plan required under section 63.7(c)(2) of 40 CFR Part 63, subpart A must identify the operating parameters to be monitored to ensure that the capture efficiency of the capture system and the control efficiency of the control device determined during the performance test are maintained. Unless EPA objects to the parameter or requests changes, you may consider the parameter approved.

[Authority for term: section 63.3400(d) of 40 CFR Part 63, subpart JJJJ]

12. You must submit a Notification of Compliance Status as specified in section 63.9(h) of 40 CFR Part 63, subpart A.

[Authority for term: section 63.3400(e) of 40 CFR Part 63, subpart JJJJ]

13. You must submit performance test reports as specified in section 63.10(d)(2) of 40 CFR Part 63, subpart A if you are using a control device to comply with the emission standard and you have not obtained a waiver from the performance test requirement or you are not exempted from this requirement by section 63.3360(b) of 40 CFR Part 63, subpart JJJJ. The performance test reports must be submitted as part of the notification of compliance status required in section A.IV.12 above.

[Authority for term: section 63.3400(f) of 40 CFR Part 63, subpart JJJJ]

14. You must submit startup, shutdown, and malfunction reports as specified in section 63.10(d)(5) of 40 CFR Part 63, subpart A, except that the provisions in subpart A of 40 CFR Part 63 pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with 40 CFR Part 63, subpart JJJJ.

- a. If actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the affected source's SSMP required by section 63.6(e)(3) of 40 CFR Part 63, subpart A, the owner or operator must state such information in the report. The startup, shutdown, or malfunction report must consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy and must be submitted to the Administrator.

- b. Separate startup, shutdown, and malfunction reports are not required if the information is included in the report specified in section 63.3400(c)(2)(vi) of 40 CFR Part 63, subpart JJJJ.

[Authority for term: section 63.3400(g) of 40 CFR Part 63, subpart JJJJ]

15. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 180 days of December 5, 2005. (See terms and conditions A.V.5 and A.V.6 below.)

- b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.
 - c. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - i. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - ii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. The control device for K007 is shared with emissions unit K001. During the testing, inlet concentration will be measured at a single point, as the summation of both emissions units.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 3. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or

local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

5. If you are using an add-on control device other than solvent recovery, such as an oxidizer, to comply with the emission standards in section 63.3320 of 40 CFR Part 63, subpart JJJJ, you must conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in paragraphs 5.a and 5.b below. During the performance test, you must establish the operating limits required by section A.II.3 of these terms and conditions according to 5.c below.
 - a. An initial performance test to establish the destruction or removal efficiency of the control device must be conducted such that control device inlet and outlet testing is conducted simultaneously, and the data are reduced in accordance with the test methods and procedures in paragraphs 5.a.i through 5.a.ix below. You must conduct three test runs as specified in section 63.7(e)(3) of 40 CFR Part 63, subpart A, and each test run must last at least 1 hour.
 - i. Method 1 or 1A of 40 CFR part 60, appendix A, must be used for sample and velocity traverses to determine sampling locations.
 - ii. Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR part 60, appendix A, must be used to determine gas volumetric flow rate.
 - iii. Method 3, 3A, or 3B of 40 CFR part 60, appendix A, must be used for gas analysis to determine dry molecular weight. You may also use as an alternative to Method 3B the manual method for measuring the oxygen, carbon dioxide, and carbon monoxide content of exhaust gas in ANSI/ASME PTC 19.10—1981, "Flue and Exhaust Gas Analyses [Part 10, Instruments and Apparatus]," (incorporated by reference, see section 63.14 of 40 CFR Part 63, subpart A).
 - iv. Method 4 of 40 CFR part 60, appendix A, must be used to determine stack gas moisture.
 - v. The gas volumetric flow rate, dry molecular weight, and stack gas moisture must be determined during each test run specified in paragraph 5.a.vii below.
 - vi. Method 25 or 25A of 40 CFR part 60, appendix A, must be used to determine total gaseous non-methane organic matter concentration. Use the same test method for both the inlet and outlet measurements which must be conducted simultaneously.

You must submit notice of the intended test method to the Administrator for approval along with notification of the performance test required under section 63.7(b) of 40 CFR Part 63, subpart A. You must use Method 25A if any of the conditions described in paragraphs 5.a.vi.(a) through 5.a.vi.(d) below apply to the control device.

- (a) The control device is not an oxidizer.
 - (b) The control device is an oxidizer but an exhaust gas volatile organic matter concentration of 50 ppmv or less is required to comply with the emission standards in section 63.3320 of 40 CFR Part 63, subpart JJJJ; or
 - (c) The control device is an oxidizer but the volatile organic matter concentration at the inlet to the control system and the required level of control are such that they result in exhaust gas volatile organic matter concentrations of 50 ppmv or less; or
 - (d) The control device is an oxidizer but because of the high efficiency of the control device the anticipated volatile organic matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.
- vii. Except as provided in section 63.7(e)(3) of 40 CFR Part 63, subpart A, each performance test must consist of three separate runs with each run conducted for at least 1 hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining volatile organic compound concentrations and mass flow rates, the average of the results of all the runs will apply.
- viii. Volatile organic matter mass flow rates must be determined for each run specified in paragraph 5.a.vii above using Equation 1 of this section:

$$Mf = [Qsd] \times [Cc] \times [12] \times [0.0416] \times [10^{-6}] \quad \text{Eq.1}$$

Where:

Mf = Total organic volatile matter mass flow rate, kilograms (kg)/hour (h).

Qsd = Volumetric flow rate of gases entering or exiting the control device, as determined according to paragraph 5.a.ii above, dry standard cubic meters (dscm)/h.

Cc = Concentration of organic compounds as carbon, ppmv.

12.0 = Molecular weight of carbon.

0.0416 = Conversion factor for molar volume, kg-moles per cubic meter (mol/m³) (at 293 Kelvin (K) and 760 millimeters of mercury (mmHg)).

- ix. For each run, emission control device destruction or removal efficiency must be determined using Equation 2 of this section:

$$E = (M_{fi} - M_{fo}) / (M_{fi}) \times 100 \quad \text{Eq. 2}$$

Where:

E = Organic volatile matter control efficiency of the control device, percent.

M_{fi} = Organic volatile matter mass flow rate at the inlet to the control device, kg/h.

M_{fo} = Organic volatile matter mass flow rate at the outlet of the control device, kg/h.

- x. The control device destruction or removal efficiency is determined as the average of the efficiencies determined in the test runs and calculated in Equation 2 of this section.
- b. You must record such process information as may be necessary to determine the conditions in existence at the time of the performance test. Operations during periods of startup, shutdown, and malfunction will not constitute representative conditions for the purpose of a performance test.
- c. If you are using one or more add-on control device other than a solvent recovery system for which you conduct a liquid-liquid material balance to comply with the emission standards in section 63.3320 of 40 CFR Part 63, subpart JJJJ, you must establish the applicable operating limits required by section A.II.3 of these terms and conditions. These operating limits apply to each add-on emission control device, and you must establish the operating limits during the performance test required by paragraph 5 above according to the requirements in paragraph 5.c.i below.
- i. If your add-on control device is a thermal oxidizer, establish the operating limits according to paragraphs 5.c.i.(a) and 5.c.i.(b) below.
- (a) During the performance test, you must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. You must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.

- (b) Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for your thermal oxidizer.

[Authority for term: section 63.3360(e) of 40 CFR Part 63, subpart JJJJ]

- 6. If you demonstrate compliance by meeting the requirements of sections 63.3370(e), (f), (g), (h), (i)(2), (k), (n)(2) or (3), or (p) of 40 CFR Part 63, subpart JJJJ, you must determine capture efficiency using the procedures in paragraph 6.a below.
 - a. You may assume your capture efficiency equals 100 percent if your capture system is a permanent total enclosure (PTE). You must confirm that your capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR part 51, appendix M, and that all exhaust gases from the enclosure are delivered to a control device.

[Authority for term: section 63.3360(f) of 40 CFR Part 63, subpart JJJJ]

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

5 percent, by weight, materials applied on the press by the product and packaging rotogravure printing operations

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the monthly record keeping of the total mass of each material applied on the press and on the press by the product and packaging rotogravure printing operations as required by section A.III.7 of these terms and conditions.
 - b. Emission Limitation:

1.0 kilogram VOC per kilogram ink solid

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping as required in sections A.III.5 and A.III.6 of these terms and conditions.

Methods in appendix A of 40 CFR Part 60, except as provided under section 60.8(b) of 40 CFR Part 60, subpart A, shall be used to determine compliance with section 60.582(a) of 40 CFR Part 60, subpart FFF as follows:

- a. Method 24 for analysis of inks. If nonphotochemically reactive solvents are used in the inks, standard gas chromatographic techniques may be used to identify and quantify these solvents. The results of Method 24 may be adjusted to subtract these solvents from the measured VOC content.

[Authority for term: section 60.583(a)(1) of 40 CFR Part 60, subpart FFF]

- c. Emission Limitation:

2.5 lbs/hr of VOC for coatings

Applicable Compliance Method:

Compliance shall be demonstrated by multiply the derived VOC emission factor of pound(s) of VOC per linear yard of material processed* by the maximum hourly production rate times (1-0.95**).

*The worst-case emission factor was developed per the "UV Coater Emissions Experiment" document dated May 11, 2004.

**Overall control efficiency required by OAC rule 3745-31-05(A)(3).

- d. Emission Limitation:

12.0 tons of VOC per year

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the monthly record keeping as required in section A.III.1 of these terms and conditions.

- e. Emission Limitation:

The permittee shall limit emissions to no more than 5 percent of the organic Hazardous Air Pollutants (HAP) applied for the month.

Applicable Compliance Method:

If you operate more than one capture system or more than one control device and only have always-controlled work stations, then you are in compliance with the emission standards in section 63.3320(b)(1) of 40 CFR Part 63, subpart JJJJ for the month if for each web coating line or group of web coating lines controlled by a common control device the overall organic HAP control efficiency as determined by paragraphs 7.e.i through 7.e.iv below for each web coating line or group of web coating lines served by that control device and a common capture system is at least 95 percent at an existing affected source.

- i. Determine the oxidizer destruction efficiency using the procedure in section A.V.5 of these terms and conditions.
- ii. Determine the capture system capture efficiency in accordance with section A.V.6 of these terms and conditions.
- iii. Capture and control efficiency monitoring. Whenever a web coating line is operated, continuously monitor the operating parameters established in accordance with sections A.III.9 and A.III.10 of these terms and conditions to ensure capture and control efficiency.
- iv. Control efficiency. Calculate the overall organic HAP control efficiency achieved using Equation 11 below:

$$R = [(E) \times (CE)]/100 \quad \text{Eq. 11}$$

Where:

R = Overall organic HAP control efficiency, percent.

E = Organic volatile matter control efficiency of the control device, percent.

CE = Organic volatile matter capture efficiency of the capture system, percent.

[Authority for term: sections 63.3370(k)(1)(i) through (iii), (k)(2)(i), and (p) of 40 CFR Part 63, subpart JJJJ]

- f. Emission Limitation:

95% overall control efficiency for VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in sections A.V.1 through A.V.6 of these terms and conditions.

VI. Miscellaneous Requirements

- 1. The terms and conditions in this Permit to Install 16-02376 shall supersede all the air pollution control requirements for K007 in Permit to Install 16-02286, issued on June 5, 2003.
- 2. In delegating implementation and enforcement authority to a State under 40 CFR part 63, subpart E, the authorities contained in section A.VI.3 of these terms and conditions must be retained by the Administrator and not transferred to a State.

Schneller Inc

PTI Application: 16-02376

Issued: 12/21/2004

Facility ID: 1667040015

Emissions Unit ID: K007

[Authority for term: section 63.3420(a) of 40 CFR Part 63, subpart JJJJ]

3. Authority which will not be delegated to States: section 63.3360(c) of 40 CFR Part 63, subpart JJJJ, approval of alternate test method for organic HAP content determination; section 63.3360(d) of 40 CFR Part 63, subpart JJJJ, approval of alternate test method for volatile matter determination.

[Authority for term: section 63.3420(b) of 40 CFR Part 63, subpart JJJJ]

B. State Only 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>
K007 - UV Coater - equipment consists of a coating station and a rotogravure printer in line with a UV curing station (the terms and conditions of this permit supercede the terms and conditions in PTI 16-02286 issued 6/5/2003).	None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None