



State of Ohio Environmental Protection Agency

Street Address:

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

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Mailing Address:

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

08/04/06

**RE: Proposed Title V Chapter 3745-77 Permit
14-31-15-0945
Graphic Packaging International Inc**

Attn: Stacey Coburn AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Coburn:

The proposed issuance of the Title V permit for Graphic Packaging International Inc, has been created in Ohio EPA's State Air Resources System (STARS) on 08/04/06, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

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

cc: Hamilton County Dept. of Environmental Services
File, DAPC PIER



State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 08/04/06	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 14-31-15-0945 to:
 Graphic Packaging International Inc
 10600 Evendale Drive
 Cincinnati, OH 45241

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K001 (Press 1) Printing and cutting paperboard packaging material	Printing and cutting paperboard packaging materials
K002 (Press 2)	K005 (Press #3) Rotogravure Press #3

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Hamilton County Dept. of Environmental Services
 250 William Howard Taft Rd
 Cincinnati, OH 45219-2660
 (513) 946-7777

OHIO ENVIRONMENTAL PROTECTION AGENCY

Joseph P. Koncelik
 Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c)).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply

reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable

requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))
- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

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.

(Authority for term: OAC rule 3745-77-07(A)(5))

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

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, in accordance with A.10 below. 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.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
 - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - ii. the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

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.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. 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.

(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
 - 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent “modification” or “installation” as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (i.e., postmarked) quarterly, 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.)

2. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. 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.

6. 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 emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

B005 - less than 10 MMBtu/hr natural gas-fired boiler;
B006 - less than 10 MMBtu/hr natural gas-fired boiler;
P008 - soil vapor extraction system;
P009 - baler cyclone no.1;
P010 - baler cyclone no.2;
T001 - fixed-roof storage tank (glue);
T002 - fixed-roof storage tank (glue);
T003 - fixed-roof storage tank (varnish); and
T004 - fixed-roof storage tank (varnish).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

(Authority for term: OAC rule 3745-77-07(A)(13))

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

R001 - water based glue line;
R002 - water based glue line;
R003 - water based glue line;
R004 - water based glue line;
R005 - water based glue line;
R006 - water based glue line;
R007 - water based glue line;
R008 - water based glue line;
R009 - water based glue line; and
R010 - water based glue line.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 1 (K001)

Activity Description: Printing and cutting paperboard packaging material

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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 printing press	OAC rule 3745-31-05(A)(3) (PTI 14-04335)	<p>Coating Emissions: 509.93 lbs of volatile organic compounds (VOC)/day*.</p> <p>Natural Gas Combustion Emissions*: 0.1 lb NOx/mmBtu; 5.9 tons/yr NOx; 0.084 lb CO/mmBtu; 5.0 tons/yr CO; 0.0006 lb SO2/mmBtu; 0.04 ton/yr SO2; 0.011 lb VOC/mmBtu; 0.65 ton/yr VOC; 0.0076 lb of particulate emissions (PE)/PM10/mmBtu; and 0.45 ton/yr PE/PM10.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-17-07(A), 3745-21-09(Y)(1), and 40 CFR Part 63, Subpart KK.</p> <p>*The daily VOC emission limitation and emissions from the combustion of natural gas outlined in this permit are based upon the emissions unit's Potentials to Emit (PTE). Therefore, no monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(C) (PTI 14-04335)	39.93 tons/yr VOC, from coatings, based on a rolling, 12-month summation. See Sections A.I.2.a, A.I.2.b, A.II.1, and A.II.2 below.
	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)	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(Y)(1) 40 CFR, Part 63, Subpart KK	See Section A.I.2.c below The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).
		See Section A.I.2.a below.

2. Additional Terms and Conditions

- 2.a** Should hazardous air pollutant (HAP) usage for emissions units K001, K002, K005 and any insignificant emissions units, exempt or de minimus sources at this facility exceed either:
- i. 9.1 Mg (10 tons) per each rolling, 12-month period of any single HAP for emissions units K001, K002, K005 and any insignificant emissions units, exempt or de minimus sources at this facility, including materials used for source categories or purposes other than printing or publishing, or
 - ii. 22.7 Mg (25 tons) per each rolling, 12-month period of any combination of HAP for emissions units K001, K002, K005 and any insignificant emissions units, exempt or de minimus sources at this 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

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart KK))

2. Additional Terms and Conditions (continued)

- 2.b** The VOC content of the coatings (i.e., inks and varnishes) employed in this emissions unit shall not exceed the following:
- i. 10.72 percent VOC by weight, as a maximum for any coatings employed; and
 - ii. 4.6 percent VOC as a weighted average, based upon a rolling, 12-month summation, of all the inks and varnishes employed.

(Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3) and 3745-31-05(C))

- 2.c** The VOC content of the coatings (i.e., inks and varnishes) employed in this emissions unit shall not exceed the following:

- i. 40 percent VOC by volume of the ink or varnish, excluding water and exempt solvents; or
- ii. 25 percent VOC by volume of the volatile matter in the ink or varnish.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-21-09(Y)(1))

II. Operational Restrictions

- 1.** The maximum annual ink usage for this emissions unit shall not exceed 807,322 pounds per year, based upon a rolling, 12-month summation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(C))

- 2.** The maximum annual varnish usage for this emissions unit shall not exceed 928,910 pounds per year, based upon a rolling, 12-month summation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(C))

III. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall collect and record the following information on a monthly basis, for emissions units K001, K002, K005 and any insignificant emissions units, exempt or de minimus sources at this 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 HAP 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;

III. Monitoring and/or Record Keeping Requirements (continued)

- g. the total combined HAP 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 from 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 HAP usage from 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 for the previous, rolling 12-month period, in tons; and
- l. the total combined HAP emissions for all emissions units at the facility for the previous, 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.

(Authority for term: OAC rule 3745-77-07(C)(1), 3745-31-05(C) and 40 CFR Part 63, Subpart KK)

2. When using compliant coatings (i.e., each coating contains less than the maximum VOC content specified in Sections A.I.2.b and A.I.2.c), the permittee shall maintain monthly records that list the following information for each coating (i.e., ink and varnish) employed in this emissions unit:
- a. the name and identification number of each ink and varnish employed, as applied;
 - b. the amount, in pounds, of each ink and varnish employed;
 - c. the monthly totals, in pounds, for all the inks and all the varnishes employed;
 - d. the VOC content of each ink and varnish, as applied, in percent by weight;
 - e. the percent VOC by volume of each ink and varnish, as applied, excluding water and exempt solvents or the percent VOC by volume of the volatile matter in the ink or varnish, as applied;
 - f. the updated, rolling, 12-month summation of the coating usage for inks and varnishes employed, in pounds per year. This value shall be calculated by taking the monthly summation of the ink and varnish usage totals rates recorded in line (c) and adding it to the previous 11-months usage totals recorded in line (c);
 - g. the updated, rolling, 12-month weighted average VOC content of all inks and varnishes. This value shall be calculated by the methods specified in OAC rule 3745-21-10(B)(9);
 - h. the total monthly VOC emission rate in lbs/month. This emission rate shall be calculated by taking the summation of the usage rate(s) collected and recorded in line (b) multiplied by the VOC content(s) recorded in line (d) for each ink and varnish employed; and
 - i. the updated rolling, 12-month summation of the VOC emissions, in tons per year. This value shall be calculated by taking the total monthly VOC emission rate recorded in line (h) and adding it to the previous 11-month VOC emission total recorded in line (h), and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-21-09(Y)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

3. Compliance with the VOC content restrictions specified in OAC rule 3745-21-09(Y)(1) may be based on a daily volume-weighted average as provided for in OAC rule 3745-21-10.

When calculating a daily volume-weighted average VOC content, the permittee shall collect and record the following information each day for this emissions unit:

- a. the name and identification number of each coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
- c. the volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9).

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-21-09(Y)(1), and 3745-21-10(B)(9))

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-04335, issued on 6/19/03: Sections A.III.1 - A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following emission limitations:
- a. the HAP emission limitations specified in Section A.I.2.a;
 - b. the TPY VOC emission limitation specified in Section A.I; and
 - c. the ink and varnish usage limitations in specified in Sections A.II.1 and A.II.2.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. The permittee shall submit annual reports that summarize the tons/year VOC emission totals for this emissions unit. These reports shall be submitted by January 31 of each year and cover the previous calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1))

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings as specified in Section A.I.2.b (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month during which the use of the non-complying coating(s) occurred.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

IV. Reporting Requirements (continued)

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-04335, issued on 01/24/06: Sections A.IV.1 - A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings as specified in Sections A.I.2.c (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days following the end of the calendar month during which the use of the non-complying coating(s) occurred.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-21-09(B)(3)(i))

V. Testing Requirements

1. Compliance with the emission limitations and material usage restrictions specified in this permit shall be determined in accordance with the following methods:
 - 1.a U.S. EPA Method 24A shall be used to determine the VOC content for rotogravure printing lines and related coatings. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative statements for Method 24A. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of all cleanup materials employed in this emissions unit.

(Authority for term: OAC rules 3745-21-09(Y)(1) and 3745-77-07(C)(1))

- 1.b Emission Limitations:
0.084 lb CO/mmBtu, 5.0 tons/yr CO;
0.1 lb NOx/mmBtu, 5.9 tons/yr NOx;
0.0006 lb SO2/mmBtu, 0.04 ton/yr SO2;
0.011 lb VOC/mmBtu, 0.65 ton/yr VOC; and
0.0076 lb PE/PM10/mmBtu, 0.45 ton/yr PE/PM10.

Applicable Compliance Method:

The lb/mmBtu and tons/year emission limitations for the combustion of natural gas are based on the emissions units' PTE.

Compliance with the lbs/mmBtu emission limitations may be demonstrated by the emission factors from AP-42, Section 1.4, Natural Gas Combustion (dated 7/98).

The tons per year emission limitations may be demonstrated by multiplying the maximum heat input (recorded in mmBtu/hr) to the dryers associated with this emissions unit, by the lbs/mmBtu emission factors from AP 42, Section 1.4., Natural Gas Combustion (dated 7/98) by 8760 hours per year, and then dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
509.93 lbs VOC/day

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units PTE. The PTE was calculated by multiplying the maximum ink usage rate of 2212 lbs/day by the maximum VOC content employed of 10.72 percent by weight (i.e., 0.1072) and adding this to the maximum varnish usage rate of 2545 lbs/day multiplied by the maximum VOC content employed of 10.72 percent by weight (i.e., 0.1072).

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- 1.d** Emission Limitation:
39.93 tons/yr VOC from coatings, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual VOC limitation shall be based on the information collected and recorded in Section A.III.2.i of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- 1.e** Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

- 1.f** Emission Limitations:
The total allowable usage of Hazardous Air Pollutants (HAPs) from this facility shall not exceed 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAPs usage limitations above shall be based on information collected and recorded in Sections A.III.1.k and A.III.1.l of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1), and 40 CFR Part 63, Subpart KK)

- 1.g** Usage Limitations:
807,322 pounds per year of ink, based upon a rolling, 12-month summation; and
928,910 pounds per year of varnish, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the usage limitations above shall be based on the information collected and recorded in Section A.III.2.f of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

V. Testing Requirements (continued)

1.h VOC Content Limitations:

40 percent VOC by volume of the coating and ink, excluding water and exempt solvents;
25 percent VOC by volume of the volatile matter in the coating or ink;
10.72 percent VOC by weight, as a maximum; and
4.6 percent VOC as a weighted average, based upon a rolling, 12-month summation, of all coatings employed.

Applicable Compliance Method:

Compliance with the VOC content limitations above shall be based on information collected in Sections A.III.2.d, A.III.2.e, and A.III.3.c of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-21-09(Y)(1), and 3745-77-07(C)(1))

- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-04335, issued on 6/19/03: Section A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
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8-color rotogravure printing press

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units K001 and K002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia

TLV (ug/m3): 17,400

Maximum Hourly Emission Rate (lbs/hr): 1.36 (Emissions Units K001 and K002)

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline of 100 meters (ug/m3): 393.1

MAGLC (ug/m3): 414

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

III. Monitoring and/or Record Keeping Requirements (continued)

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 2 (K002)

Activity Description: Printing and cutting paperboard packaging materials

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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 printing press	OAC rule 3745-31-05(A)(3) (PTI 14-04335)	<p>Coating Emissions: 425.75 lbs of volatile organic compounds (VOC)/day*.</p> <p>Natural Gas Combustion Emissions*: 0.1 lb NOx/mmBtu; 5.7 tons/yr NOx; 0.084 lb CO/mmBtu; 4.8 tons/yr CO; 0.0006 lb SO2/mmBtu; 0.03 ton/yr SO2; 0.011 lb VOC/mmBtu; 0.63 ton/yr VOC; 0.0076 lb of particulate emissions (PE)/PM10/mmBtu; and 0.43 ton/yr PE/PM10.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-17-07(A), 3745-21-09(Y)(1), and 40 CFR Part 63, Subpart KK.</p> <p>*The daily VOC emission limitation and emissions from the combustion of natural gas outlined in this permit are based upon the emissions unit's Potentials to Emit (PTE). Therefore, no monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(C) (PTI 14-04335)	33.34 tons/yr VOC, from coatings, based on a rolling, 12-month summation. See Sections A.I.2.a, A.I.2.b, A.II.1, and A.II.2 below.
	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)	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(Y)(1) 40 CFR, Part 63, Subpart KK	See Section A.I.2.c below. The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).
		See Section A.I.2.a below.

2. Additional Terms and Conditions

2.a Should HAP usage for emissions units K001, K002, K005 and any insignificant emissions units, exempt or de minimus sources at this facility exceed either:

- i. 9.1 Mg (10 tons) per each rolling, 12-month period of any single HAP for emissions units K001, K002, K005 and any insignificant emissions units, exempt or de minimus sources at this facility, including materials used for source categories or purposes other than printing or publishing, or
- ii. 22.7 Mg (25 tons) per each rolling, 12-month period of any combination of HAP for emissions units K001, K002, K005 and any insignificant emissions units, exempt or de minimus sources at this 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

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart KK))

2. Additional Terms and Conditions (continued)

- 2.b** The VOC content of the coatings (i.e., inks and varnishes) employed in this emissions unit shall not exceed the following:
- i. 10.72 percent VOC by weight, as a maximum; and
 - ii. 4.6 percent VOC as a weighted average, based upon a rolling, 12-month summation, of all the inks and varnishes employed.

(Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3) and 3745-31-05(C))

- 2.c** The VOC content of the coatings (i.e., inks and varnishes) employed in this emissions unit shall not exceed the following:
- i. 40 percent VOC by volume of the ink or varnish, excluding water and exempt solvents; or
 - ii. 25 percent VOC by volume of the volatile matter in the ink or varnish.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-21-09(Y)(1))

II. Operational Restrictions

1. The maximum annual ink usage for this emissions unit shall not exceed 672,768 pounds per year, based upon a rolling, 12-month summation.
2. The maximum annual varnish usage for this emissions unit shall not exceed 776,837 pounds per year, based upon a rolling, 12-month summation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(C))

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(C))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis, for emissions units K001, K002, K005 and any insignificant emissions units, exempt or de minimus sources at this 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 HAP 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;

III. Monitoring and/or Record Keeping Requirements (continued)

- g. the total combined HAP 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 from 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 HAP usage from 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 for the previous, rolling 12-month period, in tons; and
- l. the total combined HAP emissions for all emissions units at the facility for the previous, 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.

(Authority for term: OAC rule 3745-77-07(C)(1), 3745-31-05(C) and 40 CFR Part 63, Subpart KK)

2. When using compliant coatings (i.e., each coating contains less than the maximum VOC content specified in Sections A.I.2.b and A.I.2.c), the permittee shall maintain monthly records that list the following information for each coating (i.e., ink and varnish) employed in this emissions unit:
- a. the name and identification number of each ink and varnish employed, as applied;
 - b. the amount, in pounds, of each ink and varnish employed;
 - c. the monthly totals, in pounds, for all the inks and all the varnishes employed;
 - d. the VOC content of each ink and varnish, as applied, in percent by weight;
 - e. the percent VOC by volume of each ink and varnish, as applied, excluding water and exempt solvents or the percent VOC by volume of the volatile matter in the ink or varnish, as applied;
 - f. the updated, rolling, 12-month summation of the coating usage for inks and varnishes employed, in pounds per year. This value shall be calculated by taking the monthly summation of the ink and varnish usage totals rates recorded in line (c) and adding it to the previous 11-months usage totals recorded in line (c);
 - g. the updated, rolling, 12-month weighted average VOC content of all inks and varnishes. This value shall be calculated by the methods specified in OAC rule 3745-21-10(B)(9);
 - h. the total monthly VOC emission rate in lbs/month. This emission rate shall be calculated by taking the summation of the usage rate(s) collected and recorded in line (b) multiplied by the VOC content(s) recorded in line (d) for each ink and varnish employed; and
 - i. the updated rolling, 12-month summation of the VOC emissions, in tons per year. This value shall be calculated by taking the total monthly VOC emission rate recorded in line (h) and adding it to the previous 11-month VOC emission total recorded in line (h), and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-21-09(Y)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

3. Compliance with the VOC content restrictions specified in OAC rule 3745-21-09(Y)(1) may be based on a daily volume-weighted average as provided for in OAC rule 3745-21-10.

When calculating a daily volume-weighted average VOC content, the permittee shall collect and record the following information each day for this emissions unit:

- a. the name and identification number of each coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
- c. the volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9).

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-21-09(Y)(1) and 3745-21-10(B)(9))

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-04335, issued on 6/19/03: Sections A.III.1 - A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following emission limitations:
- a. the HAP emission limitations specified in Section A.I.2.a;
 - b. the TPY VOC emission limitation specified in Section A.I; and
 - c. the ink and varnish usage limitations in specified in Sections A.II.1 and A.II.2.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. The permittee shall submit annual reports that summarize the tons/year VOC emission totals for this emissions unit. These reports shall be submitted by January 31 of each year and cover the previous calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1))

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings as specified in Section A.I.2.b(i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month during which the use of the non-complying coating(s) occurred.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

IV. Reporting Requirements (continued)

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-04335, issued on 6/19/03: Sections A.IV.1 - A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings as specified in Sections A.I.2.c (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days following the end of the calendar month during which the use of the non-complying coating(s) occurred.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-21-09(B)(3)(i))

V. Testing Requirements

1. Compliance with the emission limitations and material usage restrictions specified in this permit shall be determined in accordance with the following methods:
 - 1.a U.S. EPA Method 24A shall be used to determine the VOC content for rotogravure printing lines and related coatings. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative statements for Method 24A. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of all cleanup materials employed in this emissions unit.

(Authority for term: OAC rules 3745-21-09(Y)(1) and 3745-77-07(C)(1))

- 1.b Emission Limitations:
0.084 lb CO/mmBtu, 4.8 tons/yr CO;
0.1 lb NOx/mmBtu, 5.7 tons/yr NOx;
0.0006 lb SO2/mmBtu, 0.03 ton/yr SO2;
0.011 lb VOC/mmBtu, 0.63 ton/yr VOC; and
0.0076 lb PE/PM10/mmBtu, 0.43 ton/yr PE/PM10.

Applicable Compliance Method:

The lb/mmBtu and tons/year emission limitations for the combustion of natural gas are based on the emissions units' PTE.

Compliance with the lbs/mmBtu emission limitations may be demonstrated by the emission factors from AP-42, Section 1.4, Natural Gas Combustion (dated 7/98).

The tons per year emission limitations may be demonstrated by multiplying the maximum heat input (recorded in mmBtu/hr) to the dryers associated with this emissions unit, by the lbs/mmBtu emission factors from AP 42, Section 1.4., Natural Gas Combustion (dated 7/98) by 8760 hours per year, and then dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

V. Testing Requirements (continued)

1.c Emission Limitation:
425.75 lbs VOC/day

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units PTE. The PTE was calculated by multiplying the maximum ink usage rate of 1843 lbs/day by the maximum VOC content employed of 10.72 percent by weight (i.e., 0.1072) and adding this to the maximum varnish usage rate of 2128 lbs/day multiplied by the maximum VOC content employed of 10.72 percent by weight (i.e., 0.1072).

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

1.d Emission Limitation:
33.34 tons/yr VOC from coatings, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual VOC limitation shall be based on the information collected and recorded in Section A.III.2.i of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

1.e Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

1.f Emission Limitations:
The total allowable usage of Hazardous Air Pollutants (HAPs) from this facility shall not exceed 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAPs usage limitations above shall be based on information collected and recorded in Sections A.III.1.k and A.III.1.l of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1), and 40 CFR Part 63, Subpart KK)

1.g Usage Limitations:
672,786 pounds per year of ink, based upon a rolling, 12-month summation; and
776,837 pounds per year of varnish, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the usage limitations above shall be based on the information collected and recorded in Section A.III.2.f of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

V. Testing Requirements (continued)

1.h VOC Content Limitations:

40 percent VOC by volume of the coating and ink, excluding water and exempt solvents;
25 percent VOC by volume of the volatile matter in the coating or ink;
10.72 percent VOC by weight, as a maximum; and
4.6 percent VOC as a weighted average, based upon a rolling, 12-month summation, of all coatings employed.

Applicable Compliance Method:

Compliance with the VOC content limitations above shall be based on information collected in Sections A.III.2.d, A.III.2.e, and A.III.3.c of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-21-09(Y)(1), and 3745-77-07(C)(1))

- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-04335, issued on 6/19/03: Section A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
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8-color rotogravure printing press

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units K001 and K002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia

TLV (ug/m3): 17,400

Maximum Hourly Emission Rate (lbs/hr): 1.36 (Emissions Units K001 and K002)

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline of 100 meters (ug/m3): 393.1

MAGLC (ug/m3): 414

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

III. Monitoring and/or Record Keeping Requirements (continued)

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Facility Name:
Facility ID:
Emissions Unit:

Facility Name:
Facility ID:
Emissions Unit:

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press #3 (K005)
Activity Description: Rotogravure Press #3

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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 printing press	OAC rule 3745-31-05(A)(3) (PTI 14-05151)	<p>Coating Emissions: 636.9 lbs of volatile organic compounds (VOC)/day*.</p> <p>Natural Gas Combustion Emissions*: 0.1 lb NOx/mmBtu; 2.39 tons/yr NOx; 0.084 lb CO/mmBtu; 2.01 tons/yr CO; 0.0006 lb SO2/mmBtu; 0.01 ton/yr SO2; 0.011 lb VOC/mmBtu; 0.26 ton/yr VOC; 0.0076 lb of particulate emissions (PE)/PM10/mmBtu; and 0.18 ton/yr PE/PM10.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-17-07(A), 3745-21-09(Y)(1), and 40 CFR Part 63, Subpart KK.</p> <p>*The daily VOC emission limitation and emissions from the combustion of natural gas outlined in this permit are based upon the emissions unit's Potentials to Emit (PTE). Therefore, no monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(C) (PTI 14-05151)	56.8 tons/yr VOC, from coatings, based on a rolling, 12-month summation.
	OAC rule 3745-17-07(A)	See Sections A.I.2.a, A.I.2.b, A.I.2.c, A.II.1, and A.II.2 below. Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)	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(Y)(1) 40 CFR, Part 63, Subpart KK	See Section A.I.2.d below. The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).
		See Section A.I.2.a below.

2. Additional Terms and Conditions

2.a Should HAP usage for emissions units K001, K002, K005 and any insignificant emissions units, exempt or de minimus sources at this facility exceed either:

- i. 9.1 Mg (10 tons) per each rolling, 12-month period of any single HAP for emissions units K001, K002, K005 and any insignificant emissions units, exempt or de minimus sources at this facility, including materials used for source categories or purposes other than printing or publishing, or
- ii. 22.7 Mg (25 tons) per each rolling, 12-month period of any combination of HAP for emissions units K001, K002, K005 and any insignificant emissions units, exempt or de minimus sources at this 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

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart KK))

2. Additional Terms and Conditions (continued)

2.b The VOC content of the inks employed in this emissions unit shall not exceed the following:

- i. 11.18 percent VOC by weight, as a maximum; and
- ii. 8.0 percent VOC by weight, as a weighted average, based upon a rolling, 12-month summation, of all the inks employed.

(Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3) and 3745-31-05(C))

2.c The VOC content of the varnishes employed in this emissions unit shall not exceed the following:

- i. 2 percent VOC by weight, as a maximum; and
- ii. 1.5 percent VOC as a weighted average, based upon a rolling, 12-month summation, of all the varnishes employed.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(C))

2.d The VOC content of the coatings (i.e., inks and varnishes) employed in this emissions unit shall not exceed the following:

- i. 40 percent VOC by volume of the ink or varnish, excluding water and exempt solvents; or
- ii. 25 percent VOC by volume of the volatile matter in the ink or varnish.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-21-09(Y)(1))

II. Operational Restrictions

1. The maximum annual ink usage for this emissions unit shall not exceed 1,159,000 pounds per year, based upon a rolling, 12-month summation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(C))

2. The maximum annual varnish usage for this emissions unit shall not exceed 1,388,000 pounds per year, based upon a rolling, 12-month summation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(C))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis, for emissions units K001, K002, K005 and any insignificant emissions units, exempt or de minimus sources at this 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 HAP 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;

III. Monitoring and/or Record Keeping Requirements (continued)

- g. the total combined HAP 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 from 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 HAP usage from 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 for the previous, rolling 12-month period, in tons; and
- l. the total combined HAP emissions for all emissions units at the facility for the previous, 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.

(Authority for term: OAC rule 3745-77-07(C)(1), 3745-31-05(C) and 40 CFR Part 63, Subpart KK)

2. When using compliant coatings (i.e., each coating contains less than the maximum VOC content specified in Sections A.I.2.b, A.I.2.c, and A.I.2.d), the permittee shall maintain monthly records that list the following information for each coating (i.e., ink and varnish) employed in this emissions unit:
- a. the name and identification number of each ink and varnish employed, as applied;
 - b. the amount, in pounds, of each ink and varnish employed;
 - c. the monthly totals, in pounds, for all the inks and all the varnishes employed;
 - d. the VOC content of each ink and varnish, as applied, in percent by weight;
 - e. the percent VOC by volume of each ink and varnish, as applied, excluding water and exempt solvents or the percent VOC by volume of the volatile matter in the ink or varnish, as applied;
 - f. the updated, rolling, 12-month summation of the coating usage for inks and varnishes employed, in pounds per year. This value shall be calculated by taking the monthly summation of the ink and varnish usage totals recorded in line (c) and adding it to the previous 11-months usage totals recorded in line (c);
 - g. the updated, rolling, 12-month weighted average VOC content of all inks and varnishes. This value shall be calculated by the methods specified in OAC rule 3745-21-10(B)(9);
 - h. the total monthly VOC emission rate in lbs/month. This emission rate shall be calculated by taking the summation of the usage rate(s) collected and recorded in line (b) multiplied by the VOC content(s) recorded in line (d) for each ink and varnish employed; and
 - i. the updated rolling, 12-month summation of the VOC emissions, in tons per year. This value shall be calculated by taking the total monthly VOC emission rate recorded in line (h) and adding it to the previous 11-month VOC emission total recorded in line (h), and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-21-09(Y)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

3. Compliance with the VOC content restrictions specified in OAC rule 3745-21-09(Y)(1) may be based on a daily volume-weighted average as provided for in OAC rule 3745-21-10.

When calculating a daily volume-weighted average VOC content, the permittee shall collect and record the following information each day for this emissions unit:

- a. the name and identification number of each coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
- c. the volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9).

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-21-09(Y)(1) and 3745-21-10(B)(9))

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05151, issued on 9/25/03: Sections A.III.1 - A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following emission limitations:
- a. the HAP emission limitations specified in Section A.I.2.a;
 - b. the TPY VOC emission limitation specified in Section A.I; and
 - c. the ink and varnish usage limitations in specified in Sections A.II.1 and A.II.2.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. The permittee shall submit annual reports that summarize the tons/year VOC emission totals for this emissions unit. These reports shall be submitted by January 31 of each year and cover the previous calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1))

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings as specified in Sections A.I.2.b and A.I.2.c (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month during which the use of the non-complying coating(s) occurred.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

IV. Reporting Requirements (continued)

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05151, issued on 9/25/03: Sections A.IV.1 - A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings as specified in Sections A.I.2.d (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days following the end of the calendar month during which the use of the non-complying coating(s) occurred.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-21-09(B)(3)(i))

V. Testing Requirements

1. Compliance with the emission limitations and material usage restrictions specified in this permit shall be determined in accordance with the following methods:
 - 1.a U.S. EPA Method 24A shall be used to determine the VOC content for rotogravure printing lines and related coatings. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative statements for Method 24A. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of all cleanup materials employed in this emissions unit.

(Authority for term: OAC rules 3745-21-09(Y)(1) and 3745-77-07(C)(1))

- 1.b Emission Limitations:
0.1 lb NO_x/mmBtu, 2.39 tons/yr NO_x;
0.084 lb CO/mmBtu, 2.01 tons/yr CO;
0.0006 lb SO₂/mmBtu, 0.01 ton/yr SO₂;
0.011 lb VOC/mmBtu, 0.26 ton/yr VOC; and
0.0076 lb PE/PM₁₀/mmBtu, 0.18 ton/yr PE/PM₁₀.

Applicable Compliance Method:

The lb/mmBtu and tons/year emission limitations for the combustion of natural gas are based on the emissions units' PTE.

Compliance with the lbs/mmBtu emission limitations may be demonstrated by the emission factors from AP-42, Section 1.4, Natural Gas Combustion (dated 7/98).

The tons per year emission limitations may be demonstrated by multiplying the maximum heat input (recorded in mmBtu/hr) to the dryers associated with this emissions unit, by the lbs/mmBtu emission factors from AP 42, Section 1.4., Natural Gas Combustion (dated 7/98) by 8760 hours per year, and then dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

V. Testing Requirements (continued)

1.c Emission Limitation:
636.9 lbs VOC/day

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units PTE. The PTE was calculated by multiplying the maximum ink usage rate of 4752 lbs/day by the maximum VOC content employed of 11.18 percent by weight (i.e., 0.1118) and adding this to the maximum varnish usage rate of 5280 lbs/day multiplied by the maximum VOC content employed of 2.0 percent by weight (i.e., 0.02).

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

1.d Emission Limitation:
56.8 tons/yr VOC from coatings, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual VOC limitation shall be based on the information collected and recorded in Section A.III.2.i of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

1.e Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

1.g Emission Limitations:
The total allowable usage of Hazardous Air Pollutants (HAPs) from this facility shall not exceed 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAPs usage limitations above shall be based on information collected and recorded in Sections A.III.1.k and A.III.1.l of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1), and 40 CFR Part 63, Subpart KK)

1.h Usage Limitations:
1,159,000 pounds per year of ink, based upon a rolling, 12-month summation; and
1,388,000 pounds per year of varnish, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the usage limitations above shall be based on the information collected and recorded in Section A.III.2.f of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

V. Testing Requirements (continued)

1.i VOC Content Limitations:

40 percent VOC by volume of the coating and ink, excluding water and exempt solvents;
25 percent VOC by volume of the volatile matter in the coating or ink;
11.18 percent VOC by weight (for inks);
8.0 percent VOC as a weighted average, based upon a rolling, 12-month summation, of all the inks employed
2 percent VOC by weight (for varnishes); and
1.5 percent VOC as a weighted average, based upon a rolling, 12-month summation, of all the varnishes employed.

Applicable Compliance Method:

Compliance with the VOC content limitations above shall be based on information collected in Sections A.III.2.d, A.III.2.e, and A.III.3.c of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-21-09(Y)(1), and 3745-77-07(C)(1))

- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-05151, issued on 9/25/03: Section A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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>
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8-color rotogravure printing press

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions unit K005 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia

TLV (ug/m3): 17,400

Maximum Hourly Emission Rate (lbs/hr): 1.36 (Emissions Unit K005)

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline of 100 meters (ug/m3): 393.1

MAGLC (ug/m3): 414

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

III. Monitoring and/or Record Keeping Requirements (continued)

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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