State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

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

08/21/07

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

14-31-17-0674
Diversapack LLC
Jeff A Vonderheide
470 Northland Blvd
Cincinnati, OH 45240

Dear Jeff A Vonderheide:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Hamilton County Dept. of Environmental Services within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
122 South Front Street
Columbus, Ohio 43215

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Hamilton County Dept. of Environmental Services.

Sincerely,

Michael W. Ahern

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

cc: USEPA (electronically submitted)
File, DAPC PIER
Hamilton County Dept. of Environmental Services
250 William Howard Taft Rd
Cincinnati, OH 45219-2660

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 08/21/07	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 14-31-17-0674 to:

Diversapack LLC
Indiana
Kentucky

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

K004 (NO. 3 CI Press) Flexographic press/laminator	Flexographic press/laminator	K013 (NO. 2 CI Press) Flexographic printing press
K005 (NO. 4 CI Press) Flexographic press/laminator	K007 (NO. 6 CI Press) Flexographic press/laminator	L001 (Parts Washer) Parts Washer
K006 (NO. 5 CI Press)	K010 (NO. 32 Egan) Extrusion Laminator and Coater	

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
(513) 946-7777
01/01/00

Ohio Environmental Protection Agency

_____

Chris Korleski
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 <u>Federally Enforceable</u> 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:

R001 primary treater on press 4;
R002 primary treater on press 5;
R003 secondary treater on press 5;
R004 primary treater on Egan No.31;
R005 secondary treater on Egan No.31;
R006 primary treater on Egan No.32;
R007 secondary treater on Egan No.32;
R009 solventless adhesive laminator primary corona PTI 14-05815;
R010 solventless adhesive laminator primary corona PTI 14-05815;
R011 primary corona treater PTI 14-05815;
T001 2,000-gallon fixed roof storage tanks PTI 14-02538;
T002 2,000-gallon fixed roof storage tanks PTI 14-02538;
T003 2,000-gallon fixed roof storage tanks PTI 14-02538;
T004 2,000-gallon fixed roof storage tanks PTI 14-02538; and
P011 material trim collection system.

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

B. State Only Enforceable Section

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: NO. 3 CI Press (K004)

Activity Description: Flexographic press/laminator

A. State and Federally 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K004 - flexographic printing press (#3) with catalytic incinerator	40 CFR Part 63, Subpart KK	The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants (HAPs), 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 Sections A.II.1, A.III.1, A.IV.1 and A.IV.3.a below.
	OAC rule 3745-21-09(Y)(1)(b)	See Section A.I.2.a below.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections A.II.2, A.III.2-A.III.11, A.IV.2, A.V.1.a, A.V.1.c and A.V.3-5 below.

2. Additional Terms and Conditions

2.a This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:

i. a capture efficiency which is at least 65 percent by weight; and

ii. a destruction efficiency which is at least 90 percent by weight.

II. Operational Restrictions

1. Should HAP usage for the facility exceed either:

a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or

b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

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

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for acheiving 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. This emissions unit shall be operated with an interlock system which prevents the operation of the printing press when the catalytic oxidizer is not in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis, for the entire facility:

a. the name and identification number of each coating, as applied;

b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

c. the total combined 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 other than the printing lines, in tons;

l. the total combined HAP emissions for all emissions units at the facility other than the printing lines, in tons;

m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;

n. the total combined HAP emissions for all emissions units at the facility, in tons;

o. the total individual HAP emissions for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and

p. 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) and 40 CFR Part 63, Subpart KK)

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the temperature immediately upstream and downstream of the incinerator's catalyst bed during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the following information for each day when the catalytic incinerator is in use:

a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may use the incinerator's temperature chart to determine the temperature differential across the catalyst bed.

c. A log of operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

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

Whenever the monitored values for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time, deviate from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the average temperature of the exhaust gases immediately before the catalyst bed, for the 3-hour block of time immediately following the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, can not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

The above value is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the above value based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

3. The CAM plan for monitoring the control efficiency of the catalytic incinerator controlling VOC emissions from this emissions unit has been developed for the monitoring of inlet temperatures of the catalyst bed. The CAM performance indicator, and indicator ranges, for these temperature requirements are specified in Section A.III.2. When the temperature(s) is outside of the indicator range(s) specified in Section A.III.2, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the catalytic incinerator's temperature indicator range listed in Section A.III.2, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

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

4. The average static pressure measured at the inlet plenum to the catalytic incinerator shall be maintained at a value at least 95 % of the value recorded during the most recent emission test that demonstrated the emissions unit was in compliance.

The permittee shall properly operate and maintain equipment to monitor the static pressure at the inlet plenum to the catalytic incinerator while the emissions unit is in operation. Units shall be in inches of water. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator on a once per shift basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

5. The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the static pressure measured at the inlet plenum to the catalytic incinerator. The CAM performance indicator, and indicator range, for inlet plenum static pressure is specified in Section A.III.4. When the static pressure is outside of the indicator range specified in Section A.III.4, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the static pressure indicator range listed in Section A.III.4, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

6. The range specified in Section A.III.4 is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the range specified in Section A.III.4 based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60)

7. If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

8. The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The VOC conversion efficiency of the catalyst in the catalytic incinerator, as determined during the catalytic activity test, shall be at least 90% at a test temperature that is representative of the normal temperature at the inlet to the catalytic incinerator. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

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

9. The permittee shall perform an inspection of the catalytic incinerator, including the catalyst bed, on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, as specified in the document entitled "Recommended Annual Inspection Points and Procedures" as submitted to the Ohio EPA on August 9, 2001, and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection. In accordance with the testing schedule in Section A.V.1.c, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in Section A.V.1.c. The permittee shall also perform weekly inspections of the external integrity of the catalytic incinerator.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

10. The permittee shall maintain a record of the results of each annual and weekly inspection of the catalytic incinerator, as well as the results of each catalyst activity test required in section A.V.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

11. The CAM plan for this emissions unit has been developed for VOC emissions. The CAM performance indicators for the catalytic incinerator controlling this emissions unit include the average temperature of the exhaust gases immediately before the catalyst bed, the average temperature difference across the catalyst bed, the air flow rate at the catalytic incinerator inlet, the catalyst activity testing, and an interlock system. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and complying with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to monitoring the temperature of the exhaust gases immediately before the catalyst bed and the exhaust flow rate at the outlet of this emissions unit, and testing of the catalyst activity, and operating an interlock system, the permittee also has an inspection/preventative maintenance program for the catalytic incinerator. Based on the results of the inspection/preventative maintenance program, repairs to the catalytic incinerator shall be made as needed. If the current CAM indicators and/or the catalytic incinerator system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64.6(d) and 64.7]

IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.1.i through A.III.1.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

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

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed (as determined by the continuous temperature monitor) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance when the emissions unit is in operation;

b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance;

c. a summary of the operating time for the capture (collection) system, control device, monitoring equipment, and the emissions unit;

d. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

e. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average temperature of the exhaust gases immediately before the catalyst bed into compliance with the acceptable value, was determined to be necessary and was not taken; and

f. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

NOTE: A temperature difference across the catalyst bed that was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance is not necessarily indicative of a violation of the control efficiency limitation for VOC.

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month, HAP usage limitations specified in Section A.II.1; and

b. all deviations of the static pressure range specified in Section A.III.4.

The quarterly deviation (excursion) reports shall be submitted in accordance with Part I - Section A.1.c of the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart KK and 40 CFR Part 64)

4. The permittee shall submit reports that include the results of the catalyst activity tests required in section A.V.1.c. These reports shall be submitted within 45 days after each catalyst activity test is performed.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

5. The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the external structural integrity of the catalytic incinerator has been jeopardized and it no longer operates as designed. These reports shall include information required by 40 CFR Part 64.9(a).

[Authority of term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 6 months prior to the expiration date of this permit. The emission testing shall be conducted for emissions units K004-K007 on a rotating basis using one representative press during each 5 year test effort.

The emission testing shall be conducted to demonstrate compliance with the 65%, by weight, capture and 90%, by weight, control efficiency requirements;

The following test method(s) shall be employed:

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or other approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services,

The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator and the temperature of the exhaust gases immediately before the catalyst bed at 15-minute intervals during each test run. These values shall be used to determine the indicator ranges identified in A.III.2 and A.III.4.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

(Authority for term: 3745-77-07(C)(1), OAC rule 3745-21-10, 3745-21-09(Y)(1)(b), and 40 CFR Part 64).

1.b Emission Limitation:
9.1 Mg (10 tons) per each rolling 12-month period of any single HAP, or 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAPs.

Applicable Compliance Method:
Compliance with the HAP usage limitations in Section A.II.1 shall be demonstrated by the record keeping in Section A.III.1.

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

V. Testing Requirements (continued)

1.c The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in Section A.III.9. An intent to test notification shall not be required for the testing noted in this term. The procedures for the catalyst activity test shall be in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1) and CFR Part 64]

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K004 - flexographic printing press (#3) with catalytic incinerator		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: NO. 4 CI Press (K005)

Activity Description: Flexographic press/laminator

A. State and Federally 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K005 - flexographic printing press (#4) with catalytic incinerator	40 CFR Part 63, Subpart KK	The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants (HAPs), 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 Sections A.II.1, A.III.1, A.IV.1 and A.IV.3.a below.
	OAC rule 3745-21-09(Y)(1)(b)	See Section A.I.2.a below.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections A.II.2, A.III.2-A.III.11, A.IV.2, A.V.1.a, A.V.1.c and A.V.3-5 below.

2. Additional Terms and Conditions

2.a This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:

i. a capture efficiency which is at least 65 percent by weight; and

ii. a destruction efficiency which is at least 90 percent by weight.

II. Operational Restrictions

1. Should HAP usage for the facility exceed either:

a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or

b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

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

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for acheiving 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. This emissions unit shall be operated with an interlock system which prevents the operation of the printing press when the catalytic oxidizer is not in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis, for the entire facility:

a. the name and identification number of each coating, as applied;

b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

c. the total combined 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 other than the printing lines, in tons;

l. the total combined HAP emissions for all emissions units at the facility other than the printing lines, in tons;

m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;

n. the total combined HAP emissions for all emissions units at the facility, in tons;

o. the total individual HAP emissions for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and

p. 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) and 40 CFR Part 63, Subpart KK)

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the temperature immediately upstream and downstream of the incinerator's catalyst bed during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the following information for each day when the catalytic incinerator is in use:

a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may use the incinerator's temperature chart to determine the temperature differential across the catalyst bed.

c. A log of operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

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

Whenever the monitored values for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time, deviate from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the average temperature of the exhaust gases immediately before the catalyst bed, for the 3-hour block of time immediately following the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, can not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

The above value is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the above value based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

3. The CAM plan for monitoring the control efficiency of the catalytic incinerator controlling VOC emissions from this emissions unit has been developed for the monitoring of inlet temperatures of the catalyst bed. The CAM performance indicator, and indicator ranges, for these temperature requirements are specified in Section A.III.2. When the temperature(s) is outside of the indicator range(s) specified in Section A.III.2, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the catalytic incinerator's temperature indicator range listed in Section A.III.2, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

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

4. The average static pressure measured at the inlet plenum to the catalytic incinerator shall be maintained at a value at least 95 % of the value recorded during the most recent emission test that demonstrated the emissions unit was in compliance.

The permittee shall properly operate and maintain equipment to monitor the static pressure at the inlet plenum to the catalytic incinerator while the emissions unit is in operation. Units shall be in inches of water. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator on a once per shift basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

5. The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the static pressure measured at the inlet plenum to the catalytic incinerator. The CAM performance indicator, and indicator range, for inlet plenum static pressure is specified in Section A.III.4. When the static pressure is outside of the indicator range specified in Section A.III.4, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the static pressure indicator range listed in Section A.III.4, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

6. The range specified in Section A.III.4 is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the range specified in Section A.III.4 based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60)

7. If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

8. The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The VOC conversion efficiency of the catalyst in the catalytic incinerator, as determined during the catalytic activity test, shall be at least 90% at a test temperature that is representative of the normal temperature at the inlet to the catalytic incinerator. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

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

9. The permittee shall perform an inspection of the catalytic incinerator, including the catalyst bed, on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, as specified in the document entitled "Recommended Annual Inspection Points and Procedures" as submitted to the Ohio EPA on August 9, 2001, and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection. In accordance with the testing schedule in Section A.V.1.c, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in Section A.V.1.c. The permittee shall also perform weekly inspections of the external integrity of the catalytic incinerator.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

10. The permittee shall maintain a record of the results of each annual and weekly inspection of the catalytic incinerator, as well as the results of each catalyst activity test required in section A.V.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

11. The CAM plan for this emissions unit has been developed for VOC emissions. The CAM performance indicators for the catalytic incinerator controlling this emissions unit include the average temperature of the exhaust gases immediately before the catalyst bed, the average temperature difference across the catalyst bed, the air flow rate at the catalytic incinerator inlet, the catalyst activity testing, and an interlock system. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and complying with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to monitoring the temperature of the exhaust gases immediately before the catalyst bed and the exhaust flow rate at the outlet of this emissions unit, and testing of the catalyst activity, and operating an interlock system, the permittee also has an inspection/preventative maintenance program for the catalytic incinerator. Based on the results of the inspection/preventative maintenance program, repairs to the catalytic incinerator shall be made as needed. If the current CAM indicators and/or the catalytic incinerator system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64.6(d) and 64.7]

IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.1.i through A.III.1.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

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

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed (as determined by the continuous temperature monitor) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance when the emissions unit is in operation;

b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance;

c. a summary of the operating time for the capture (collection) system, control device, monitoring equipment, and the emissions unit;

d. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

e. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average temperature of the exhaust gases immediately before the catalyst bed into compliance with the acceptable value, was determined to be necessary and was not taken; and

f. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

NOTE: A temperature difference across the catalyst bed that was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance is not necessarily indicative of a violation of the control efficiency limitation for VOC.

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month, HAP usage limitations specified in Section A.II.1; and

b. all deviations of the static pressure range specified in Section A.III.4.

The quarterly deviation (excursion) reports shall be submitted in accordance with Part I - Section A.1.c of the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart KK and 40 CFR Part 64)

4. The permittee shall submit reports that include the results of the catalyst activity tests required in section A.V.1.c. These reports shall be submitted within 45 days after each catalyst activity test is performed.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

5. The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the external structural integrity of the catalytic incinerator has been jeopardized and it no longer operates as designed. These reports shall include information required by 40 CFR Part 64.9(a).

[Authority of term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 6 months prior to the expiration date of this permit. The emission testing shall be conducted for emissions units K004-K007 on a rotating basis using one representative press during each 5 year test effort.

The emission testing shall be conducted to demonstrate compliance with the 65%, by weight, capture and 90%, by weight, control efficiency requirements;

The following test method(s) shall be employed:

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or other approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services,

The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator and the temperature of the exhaust gases immediately before the catalyst bed at 15-minute intervals during each test run. These values shall be used to determine the indicator ranges identified in A.III.2 and A.III.4.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

(Authority for term: 3745-77-07(C)(1), OAC rule 3745-21-10, 3745-21-09(Y)(1)(b), and 40 CFR Part 64).

1.b Emission Limitation:
9.1 Mg (10 tons) per each rolling 12-month period of any single HAP, or 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAPs.

Applicable Compliance Method:
Compliance with the HAP usage limitations in Section A.II.1 shall be demonstrated by the record keeping in Section A.III.1.

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

V. Testing Requirements (continued)

1.c The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in Section A.III.9. An intent to test notification shall not be required for the testing noted in this term. The procedures for the catalyst activity test shall be in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1) and CFR Part 64]

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K004 - flexographic printing press (#3) with catalytic incinerator		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: NO. 5 CI Press (K006)

Activity Description: Flexographic press/laminator

A. State and Federally 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K006 - flexographic printing press (#5) with catalytic incinerator	40 CFR Part 63, Subpart KK	The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants (HAPs), 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 Sections A.II.1, A.III.1, A.IV.1 and A.IV.3.a below.
	OAC rule 3745-21-09(Y)(1)(b)	See Section A.I.2.a below.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections A.II.2, A.III.2-A.III.11, A.IV.2, A.V.1.a, A.V.1.c and A.V.3-5 below.

2. Additional Terms and Conditions

2.a This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:

i. a capture efficiency which is at least 65 percent by weight; and

ii. a destruction efficiency which is at least 90 percent by weight.

II. Operational Restrictions

1. Should HAP usage for the facility exceed either:

a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or

b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

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

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for acheiving 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. This emissions unit shall be operated with an interlock system which prevents the operation of the printing press when the catalytic oxidizer is not in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis, for the entire facility:

a. the name and identification number of each coating, as applied;

b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

c. the total combined 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 other than the printing lines, in tons;

l. the total combined HAP emissions for all emissions units at the facility other than the printing lines, in tons;

m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;

n. the total combined HAP emissions for all emissions units at the facility, in tons;

o. the total individual HAP emissions for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and

p. 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) and 40 CFR Part 63, Subpart KK)

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the temperature immediately upstream and downstream of the incinerator's catalyst bed during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the following information for each day when the catalytic incinerator is in use:

a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may use the incinerator's temperature chart to determine the temperature differential across the catalyst bed.

c. A log of operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

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

Whenever the monitored values for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time, deviate from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the average temperature of the exhaust gases immediately before the catalyst bed, for the 3-hour block of time immediately following the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, can not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

The above value is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the above value based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

3. The CAM plan for monitoring the control efficiency of the catalytic incinerator controlling VOC emissions from this emissions unit has been developed for the monitoring of inlet temperatures of the catalyst bed. The CAM performance indicator, and indicator ranges, for these temperature requirements are specified in Section A.III.2. When the temperature(s) is outside of the indicator range(s) specified in Section A.III.2, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the catalytic incinerator's temperature indicator range listed in Section A.III.2, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

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

4. The average static pressure measured at the inlet plenum to the catalytic incinerator shall be maintained at a value at least 95 % of the value recorded during the most recent emission test that demonstrated the emissions unit was in compliance.

The permittee shall properly operate and maintain equipment to monitor the static pressure at the inlet plenum to the catalytic incinerator while the emissions unit is in operation. Units shall be in inches of water. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator on a once per shift basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

5. The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the static pressure measured at the inlet plenum to the catalytic incinerator. The CAM performance indicator, and indicator range, for inlet plenum static pressure is specified in Section A.III.4. When the static pressure is outside of the indicator range specified in Section A.III.4, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the static pressure indicator range listed in Section A.III.4, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

6. The range specified in Sectiion A.III.4 is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the range specified in Section A.III.4 based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60)

7. If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

8. The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The VOC conversion efficiency of the catalyst in the catalytic incinerator, as determined during the catalytic activity test, shall be at least 90% at a test temperature that is representative of the normal temperature at the inlet to the catalytic incinerator. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

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

9. The permittee shall perform an inspection of the catalytic incinerator, including the catalyst bed, on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, as specified in the document entitled "Recommended Annual Inspection Points and Procedures" as submitted to the Ohio EPA on August 9, 2001, and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection. In accordance with the testing schedule in Section A.V.1.c, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in Section A.V.1.c. The permittee shall also perform weekly inspections of the external integrity of the catalytic incinerator.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

10. The permittee shall maintain a record of the results of each annual and weekly inspection of the catalytic incinerator, as well as the results of each catalyst activity test required in section A.V.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

11. The CAM plan for this emissions unit has been developed for VOC emissions. The CAM performance indicators for the catalytic incinerator controlling this emissions unit include the average temperature of the exhaust gases immediately before the catalyst bed, the average temperature difference across the catalyst bed, the air flow rate at the catalytic incinerator inlet, the catalyst activity testing, and an interlock system. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and complying with the reporting requirements specified in section A.IV below. The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to monitoring the temperature of the exhaust gases immediately before the catalyst bed and the exhaust flow rate at the outlet of this emissions unit, and testing of the catalyst activity, and operating an interlock system, the permittee also has an inspection/preventative maintenance program for the catalytic incinerator. Based on the results of the inspection/preventative maintenance program, repairs to the catalytic incinerator shall be made as needed. If the current CAM indicators and/or the catalytic incinerator system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64.6(d) and 64.7]

IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.1.i through A.III.1.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

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

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed (as determined by the continuous temperature monitor) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance when the emissions unit is in operation;

b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance;

c. a summary of the operating time for the capture (collection) system, control device, monitoring equipment, and the emissions unit;

d. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

e. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average temperature of the exhaust gases immediately before the catalyst bed into compliance with the acceptable value, was determined to be necessary and was not taken; and

f. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

NOTE: A temperature difference across the catalyst bed that was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance is not necessarily indicative of a violation of the control efficiency limitation for VOC.

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month, HAP usage limitations specified in Section A.II.1; and

b. all deviations of the static pressure range specified in Section A.III.4.

The quarterly deviation (excursion) reports shall be submitted in accordance with Part I - Section A.1.c of the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart KK and 40 CFR Part 64)

4. The permittee shall submit reports that include the results of the catalyst activity tests required in section A.V.1.c. These reports shall be submitted within 45 days after each catalyst activity test is performed.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

5. The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the external structural integrity of the catalytic incinerator has been jeopardized and it no longer operates as designed. These reports shall include information required by 40 CFR Part 64.9(a).

[Authority of term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 6 months prior to the expiration date of this permit. The emission testing shall be conducted for emissions units K004-K007 on a rotating basis using one representative press during each 5 year test effort.

The emission testing shall be conducted to demonstrate compliance with the 65%, by weight, capture and 90%, by weight, control efficiency requirements;

The following test method(s) shall be employed:

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or other approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services,

The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator and the temperature of the exhaust gases immediately before the catalyst bed at 15-minute intervals during each test run. These values shall be used to determine the indicator ranges identified in A.III.2 and A.III.4.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

(Authority for term: 3745-77-07(C)(1), OAC rule 3745-21-10, 3745-21-09(Y)(1)(b), and 40 CFR Part 64).

1.b Emission Limitation:
9.1 Mg (10 tons) per each rolling 12-month period of any single HAP, or 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAPs.

Applicable Compliance Method:
Compliance with the HAP usage limitations in Section A.II.1 shall be demonstrated by the record keeping in Section A.III.1.

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

V. Testing Requirements (continued)

1.c The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in Section A.III.9. An intent to test notification shall not be required for the testing noted in this term. The procedures for the catalyst activity test shall be in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1) and CFR Part 64]

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K004 - flexographic printing press (#3) with catalytic incinerator		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: NO. 6 CI Press (K007)

Activity Description: Flexographic press/laminator

A. State and Federally 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K007 - flexographic printing press (#6) with catalytic incinerator	40 CFR Part 63, Subpart KK	The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants (HAPs), 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 Sections A.II.1, A.III.1, A.IV.1 and A.IV.3.a below.
	OAC rule 3745-21-09(Y)(1)(b)	See Section A.I.2.a below.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections A.II.2, A.III.2-A.III.11, A.IV.2, A.V.1.a, A.V.1.c and A.V.3-5 below.

2. Additional Terms and Conditions

2.a This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:

i. a capture efficiency which is at least 65 percent by weight; and

ii. a destruction efficiency which is at least 90 percent by weight.

II. Operational Restrictions

1. Should HAP usage for the facility exceed either:

a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or

b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

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

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for acheiving 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. This emissions unit shall be operated with an interlock system which prevents the operation of the printing press when the catalytic oxidizer is not in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis, for the entire facility:

a. the name and identification number of each coating, as applied;

b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

c. the total combined 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 other than the printing lines, in tons;

l. the total combined HAP emissions for all emissions units at the facility other than the printing lines, in tons;

m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;

n. the total combined HAP emissions for all emissions units at the facility, in tons;

o. the total individual HAP emissions for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and

p. 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) and 40 CFR Part 63, Subpart KK)

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the temperature immediately upstream and downstream of the incinerator's catalyst bed during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the following information for each day when the catalytic incinerator is in use:

a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may use the incinerator's temperature chart to determine the temperature differential across the catalyst bed.

c. A log of operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

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

Whenever the monitored values for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time, deviate from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the average temperature of the exhaust gases immediately before the catalyst bed, for the 3-hour block of time immediately following the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, can not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

The above value is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the above value based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

3. The CAM plan for monitoring the control efficiency of the catalytic incinerator controlling VOC emissions from this emissions unit has been developed for the monitoring of inlet temperatures of the catalyst bed. The CAM performance indicator, and indicator ranges, for these temperature requirements are specified in Section A.III.2. When the temperature(s) is outside of the indicator range(s) specified in Section A.III.2, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the catalytic incinerator's temperature indicator range listed in Section A.III.2, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

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

4. The average static pressure measured at the inlet plenum to the catalytic incinerator shall be maintained at a value at least 95 % of the value recorded during the most recent emission test that demonstrated the emissions unit was in compliance.

The permittee shall properly operate and maintain equipment to monitor the static pressure at the inlet plenum to the catalytic incinerator while the emissions unit is in operation. Units shall be in inches of water. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator on a once per shift basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

5. The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the static pressure measured at the inlet plenum to the catalytic incinerator. The CAM performance indicator, and indicator range, for inlet plenum static pressure is specified in Section A.III.4. When the static pressure is outside of the indicator range specified in Section A.III.4, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the static pressure indicator range listed in Section A.III.4, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

6. The range specified in Section A.III.4 is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the range specified in Section A.III.4 based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

7. If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

8. The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The VOC conversion efficiency of the catalyst in the catalytic incinerator, as determined during the catalytic activity test, shall be at least 90% at a test temperature that is representative of the normal temperature at the inlet to the catalytic incinerator. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

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

9. The permittee shall perform an inspection of the catalytic incinerator, including the catalyst bed, on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, as specified in the document entitled "Recommended Annual Inspection Points and Procedures" as submitted to the Ohio EPA on August 9, 2001, and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection. In accordance with the testing schedule in Section A.V.1.c, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in Section A.V.1.c. The permittee shall also perform weekly inspections of the external integrity of the catalytic incinerator.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

10. The permittee shall maintain a record of the results of each annual and weekly inspection of the catalytic incinerator, as well as the results of each catalyst activity test required in section A.V.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

11. The CAM plan for this emissions unit has been developed for VOC emissions. The CAM performance indicators for the catalytic incinerator controlling this emissions unit include the average temperature of the exhaust gases immediately before the catalyst bed, the average temperature difference across the catalyst bed, the air flow rate at the catalytic incinerator inlet, the catalyst activity testing, and an interlock system. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and complying with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to monitoring the temperature of the exhaust gases immediately before the catalyst bed and the exhaust flow rate at the outlet of this emissions unit, and testing of the catalyst activity, and operating an interlock system, the permittee also has an inspection/preventative maintenance program for the catalytic incinerator. Based on the results of the inspection/preventative maintenance program, repairs to the catalytic incinerator shall be made as needed. If the current CAM indicators and/or the catalytic incinerator system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64.6(d) and 64.7]

IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.1.i through A.III.1.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

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

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed (as determined by the continuous temperature monitor) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance when the emissions unit is in operation;

b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance;

c. a summary of the operating time for the capture (collection) system, control device, monitoring equipment, and the emissions unit;

d. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

e. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average temperature of the exhaust gases immediately before the catalyst bed into compliance with the acceptable value, was determined to be necessary and was not taken; and

f. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

NOTE: A temperature difference across the catalyst bed that was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance is not necessarily indicative of a violation of the control efficiency limitation for VOC.

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month, HAP usage limitations specified in Section A.II.1; and

b. all deviations of the static pressure range specified in Section A.III.4.

The quarterly deviation (excursion) reports shall be submitted in accordance with Part I - Section A.1.c of the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart KK and 40 CFR Part 64)

4. The permittee shall submit reports that include the results of the catalyst activity tests required in section A.V.1.c. These reports shall be submitted within 45 days after each catalyst activity test is performed.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

5. The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the external structural integrity of the catalytic incinerator has been jeopardized and it no longer operates as designed. These reports shall include information required by 40 CFR Part 64.9(a).

[Authority of term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 6 months prior to the expiration date of this permit. The emission testing shall be conducted for emissions units K004-K007 on a rotating basis using one representative press during each 5 year test effort.

The emission testing shall be conducted to demonstrate compliance with the 65%, by weight, capture and 90%, by weight, control efficiency requirements;

The following test method(s) shall be employed:

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or other approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services,

The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator and the temperature of the exhaust gases immediately before the catalyst bed at 15-minute intervals during each test run. These values shall be used to determine the indicator ranges identified in A.III.2 and A.III.4.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

(Authority for term: 3745-77-07(C)(1), OAC rule 3745-21-10, 3745-21-09(Y)(1)(b), and 40 CFR Part 64).

1.b Emission Limitation:
9.1 Mg (10 tons) per each rolling 12-month period of any single HAP, or 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAPs.

Applicable Compliance Method:
Compliance with the HAP usage limitations in Section A.II.1 shall be demonstrated by the record keeping in Section A.III.1.

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

V. Testing Requirements (continued)

1.c The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in Section A.III.9. An intent to test notification shall not be required for the testing noted in this term. The procedures for the catalyst activity test shall be in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1) and CFR Part 64]

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K004 - flexographic printing press (#3) with catalytic incinerator		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: NO. 32 Egan (K010)

Activity Description: Extrusion Laminator and Coater

A. State and Federally 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K010 - rotogravure extrusion laminator and coater No. 32	40 CFR 63 Subpart KK	See section A.II.1. below.
	OAC rule 3745-21-09(F)	See section A.I.2.a. below.

2. Additional Terms and Conditions

2.a Coatings applied in the coating operations shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

II. Operational Restrictions

1. Should HAP usage for the facility exceed either:

a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or

b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing, the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820(a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for acheiving compliance with all of the MACT requirements.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

a. the name and identification number of each coating, as applied; and

b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied. The pounds of VOC per gallon of coating excluding water and exempt solvents shall be calculated as specified in OAC rule 3745-21-10(B)(8).

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific "gallons/year" and/or "tons/year" limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

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

2. The permittee shall collect and record the following information on a monthly basis, for the entire facility:

a. the name or 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 pound of coating, as applied;

c. the total combined HAPs content of each coating, in pounds of combined HAPs per pound of coating, as applied (sum all the individual HAP contents from (b));

d. the number of pounds of each coating employed;

e. the name or identification of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, as applied;

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

g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as applied (sum all the individual HAP contents from (f));

h. the number of pounds 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 HAPs 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 usage for each HAP for all emissions units at the facility other than the printing lines in tons;

l. the total combined HAPs usage for all emissions units at the facility other than the printing lines, in tons;

m. the total individual HAP usage for each HAP for all emissions units at the facility, in pounds or tons;

n. the total combined HAPs usage for all emissions units at the facility, in pounds or tons;

o. the total individual HAP usage for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and

p. the total combined HAPs usage 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) and 40 CFR Part 63 Subpart KK)

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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

2. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.2.i through A.III.2.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

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

3. The permittee shall submit quarterly deviation (excursion) reports for any exceedence of the rolling, 12-month, usage limitations specified in term A.II.1.

The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

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

V. Testing Requirements

1. Compliance with the VOC content limitation in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:
Coatings applied in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:
The permittee shall use either USEPA Method 24 for coatings or USEPA Method 24A for flexographic and rotogravure printing inks and related coatings or the coating formulation data from the coating manufacturer and coating user to determine the VOC content.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-10(B)(4)

1.b Emission Limitation:
9.1 Mg (10 tons) per each rolling 12-month period of any single HAP, or 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAPs.

Applicable Compliance Method:
Compliance with the HAP usage limits in Section A.II.1 shall be demonstrated by the record keeping in Section A.III.2.

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

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K010 - rotogravure extrusion laminator and coater No. 32		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: NO. 2 CI Press (K013)

Activity Description: Flexographic printing press

A. State and Federally 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K013 - 6-color flexographic printing press	OAC rule 3745-31-05(A)(3) (PTI 14-04781)	Volatile Organic Compound (VOC) emissions shall not exceed 290 pounds per day. Ammonia emissions shall not exceed 1.1 pounds per hour and 3.7 tons per year. The pounds per hour ammonia emission limitation is based upon the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limitation. See section A.I.2.a. The requirements of this rule also include compliance with the requirements of 40 CFR 63 Subpart KK.
	OAC rule 3745-31-05(C) (PTI 14-04781)	VOC emissions shall not exceed 37.5 tons per year, based on a rolling, 12-month summation.
	OAC rule 3745-21-09(Y)(1)(a)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart KK	See section A.II.1.

2. Additional Terms and Conditions

2.a The VOC content of the coatings and inks employed in emissions unit K013 shall not exceed twenty (20) percent VOC as a daily volume-weighted average, excluding water and exempt solvents.

II. Operational Restrictions

1. Should HAP usage for the facility exceed either:

a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or

b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing, the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820(a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for acheiving compliance with all of the MACT requirements.

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day:

a. the name or identification number of each coating and ink;

b. the VOC content of each coating and ink, in pounds of VOC per gallon, as employed;

c. the percent VOC by volume of all the coatings and inks (excluding water and exempt solvents), as a daily volume-weighted average. The percent VOC by volume calculation shall be performed as specified in OAC rule 3745-21-10(B)(9);

d. the volume, in gallons, of each coating and ink employed; and

e. the total combined VOC emissions from all coatings and inks employed, in pounds per day, calculated as the sum of (b)x(d) for each coating and ink employed.

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

2. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions:

a. the name and identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material, in pounds per gallon;

d. the total VOC emissions from all coatings (the daily summation of the VOC emissions recorded in A.III.1.e for all days the emission unit was in operation during the month) and cleanup materials, in pounds per day; and

e. the rolling, 12-month summation of the VOC emissions.

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

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

3. The permittee shall collect and record the following information on a monthly basis, for the entire facility:

a. the name and identification number of each coating, as applied;

b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

c. the total combined 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;

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 other than the printing lines, in tons;

l. the total combined HAP emissions for all emissions units at the facility other than the printing lines, in tons;

m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;

n. the total combined HAP emissions for all emissions units at the facility, in tons;

o. the total individual HAP emissions for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and

p. 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) and 40 CFR Part 63, Subpart KK)

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 14-04781: 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.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

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

2. The permittee shall submit quarterly deviation (excursion) reports for the following information:

a. the 37.5 TPY of VOC emission limitations based on rolling, 12-month summation; and

b. the rolling, 12-month, HAP usage limitations specified in A.II.1.

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

3. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.2.e for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

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

4. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.3.i through A.III.3.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

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

5. 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 14-04781: A.IV.1-AIV.4. 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.

V. Testing Requirements

1. Compliance with the VOC content limitation in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
The VOC content of the coatings and inks shall not exceed twenty (20) percent VOC as a daily volume-weighted average, excluding water and exempt solvents.

Applicable Compliance Method:
Copmliance shall be demonstrated by the information collected and recorded in A.III.1.c.

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

1.b Emission Limitation:
9.1 Mg (10 tons) per each rolling 12-month period of any single HAP, or 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAPs.

Applicable Compliance Method:
Compliance with the HAP usage limitatiions in Section A.II.1 shall be demonstrated by the record keeping in Section A.III.3.

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

V. Testing Requirements (continued)

1.c Emission Limitation:
Volatile Organic Compounds (VOC) emissions shall not exceed 290 pounds per day.

Applicable Compliance Method:
Compliance with the daily emission limitation in section A.I.1 shall be demonstrated by the record keeping requirements specified in section A.III.1.e.

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

1.d Emission Limitation:
Ammonia emissions shall not exceed 1.1 pounds per hour and 3.7 tons per year.

Applicable Compliance Method:
The short term ammonia emission limitations are based upon the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit. Compliance with the annual ammonia limitation is based upon the maximum possible operational time associated with the emissions unit. Compliance is assumed provided compliance is maintained with the rolling, 12-month VOC limitation.

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

1.e Emission Limitation:
Volatile Organic Compound (VOC) emissions shall not exceed 37.5 tons per year, based on a rolling, 12-month summation.

Applicable Compliance Method:
Compliance with the annual emission limitation in section A.I.1shall be demonstrated by the record keeping requirements specified in section A.III.2.e.

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

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 14-04781: A.V.1.a - A.V.1.e. 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.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K013 - 6-color flexographic 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 this emissions unit K013 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable 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): 1.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 216
MAGLC (ug/m3): 414

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

2. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Parts Washer (L001)

Activity Description: Parts Washer

A. State and Federally 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
L001 - cold cleaner (non-halogenated solvent) with cover	OAC rule 3745-21-09(O)(2)	See sections A.I.2.a, A.I.2.b, A.I.2.c and A.I.2.d below.

2. Additional Terms and Conditions

2.a The cold cleaner shall be operated with a cover; and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit, or if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand. The cover shall remain closed at all times, except when parts are being handled or solvent is being added or removed.

2.b The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.

2.c A freeboard ratio of greater than or equal to 0.7 shall be maintained.

2.d The permittee shall not employ a solvent in the cold cleaner with a vapor pressure greater than 1.0 mm Hg (0.019 psi), measured at 20 degrees Celsius (68 degrees Fahrenheit).

II. Operational Restrictions

1. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:

a. A permanent, legible, conspicuous label, summarizing the operating requirements shall be maintained near or attached to the cold cleaner;

b. Waste solvent shall be stored in covered containers;

c. The cover shall remain closed whenever parts are not being handled in the cleaner;

d. Cleaned parts shall drain until dripping ceases;

e. If used, a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) shall be supplied at a pressure that does not exceed 10 pounds per square inch gauge; and

f. Porous and/or absorbent materials shall not be cleaned in the cold cleaner.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-09(O)(2))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:

a. the types of solvents employed in the cold cleaner, including the chemical name(s) and concentration;

b. the vapor pressure of each solvent applied, in pound per square inch absolute, measured at 100 degrees Fahrenheit; and

c. the maximum temperature at which the solvent is maintained, if not maintained at room temperatures.

The records for the types of solvents employed during each year and the vapor pressure of each solvent at 100 degrees Fahrenheit shall be maintained for at least 5 years and shall be made available to the director or his representative upon verbal or written request.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(O)(2))

2. The permittee shall maintain records of the following information for each solvent purchase:

a. the date of purchase;

b. the name, company identification, and chemical composition of the solvent; and

c. the vapor pressure of each solvent, measured in mm Hg at 20 degrees Celsius (68 degrees Fahrenheit), as determined by ASTM D2879-97, "Standard Test Method for Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope".

These records shall be maintained for at least 5 years and shall be made available to the director or his representative upon verbal or written request.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(O)(2))

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports documenting any period of time in which a solvent with a vapor pressure greater than 1.0 mm Hg (0.019 psi), measured at 20 degrees Celsius (68 degrees Fahrenheit), was employed in the emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(O)(2))

V. Testing Requirements

1. The free board ratio shall be determined by dividing the height (distance from the solvent surface to the top edge of the degreaser tank) by the width (at the solvent surface).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(O)(2))

2. Compliance with the vapor pressure limitation in Section A.I.2.d shall be demonstrated by the record keeping requirements in Section A.III.2.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(O)(2))

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
L001 - cold cleaner (non-halogenated solvent) with cover		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Statement of Basis For Title V Permit

Company Name	Diversapack, LLC
Premise Number	1431170674
What makes this facility a Title V facility?	VOC emissions greater than 100 TPY
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	As part of the renewal, we are adding compliance assurance monitoring provisions and also adding our current standard terms and conditions for control devices pursuant to Andrew Hall's General Electric (GE) memo dated 07/11/06 as a result of a State of Ohio Environmental Review Appeals Commission (ERAC) decision that were not previously listed in the originally issued final Title V permitting action.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

A.1.a	77-01(U)		List of insignificant emissions units.

C **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State & Federally Enforceable Section)

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K004 K005 K006 K007 K010 K013	10 TPY single HAP, 25 TPY combined HAPS	77-07(A)(1)	40 CFR Part 63, KK	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - 65% capture, 90% destruction; 10 TPY single HAP, 25 TPY combined HAP limits; interlock system on oxidizer M&R- HAP monitoring and record keeping to show compliance with 40 CFR 63, KK. Rp- Quarterly deviation and annual HAP usage and emissions reports will demonstrate compliance with HAP limitations. ET- Compliance ensured by maintaining monitoring requirements.

K004 K005 K006 K007	Capture efficiency of 65% by weight, destruction efficiency of 90% by weight	21-09(Y)(1)(b)	40 CFR Part 63, KK	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - Catalytic oxidizer with interlocking system will operate at all times the emissions units are in operation. Oxidizer will operate at a temperature not less than 50 degrees below the average temperature of last compliance test. Average static pressure of inlet plenum maintained at a value at least 95% of the value recorded during the last compliance test. M&R - Daily records which document average temperature not less than 50 degrees below the average temperature of last compliance test and across catalyst bed, log of oxidizer downtime and static pressure at the inlet plenum to the oxidizer. Catalyst activity. Rp - Deviation reports for average temperature across catalyst bed and static pressure range. ET - A five year testing frequency was determined to be sufficient to demonstrate compliance due to facility's history of compliance.
K010	2.9 lbs VOC/gal of coatings	21-09(F)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - 10 TPY single HAP, 25 TPY combined HAPs limit M&R - Monthly monitoring and record keeping of coating ID and VOC per gallon coating will demonstrate compliance with lb/gal limitation. Rp - Report of noncompliant coating within 30 days following end of calender month. ET - Method 24 or 24A if required.
K013	290 lbs/day VOC	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - VOC content limit of 20% VOC as daily volume-weighted average. M&R - Daily record keeping of VOC emissions. Rp - Deviation of daily volume-weighted average VOC content. Compliance with this rule will demonstrate compliance with daily emissions limitation. ET - Compliance ensured by maintaining monitoring requirements.
K013	1.1 lbs/hr and 3.7 TPY ammonia	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	OR - Ammonia emission based on potential to emit so no operational restriction required. M,R,& Rp - Short term limitation is based upon potential to emit so no record keeping or reporting is necessary. Compliance with annual limitation is assumed provided compliance is maintained with rolling, 12-month VOC limit. ET - Compliance ensured by maintaining monitoring requirements.

K013	20% VOC content of coatings and inks	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	OR - 20% VOC content for coatings and inks M&R - Daily record keeping of % VOC by volume as a daily-weighted average. Rp - Deviation of daily volume-weighted average VOC content. ET - Compliance ensured by maintaining monitoring requirements.
K013	37.5 TPY VOC as a rolling, 12-month summation	31-05(C)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - 20% VOC content for coatings and inks M&R - Monthly VOC emissions including the rolling, 12-month summation. Rp - Annual reports showing rolling, 12-month summation of VOC emissions. ET - Compliance ensured by maintaining monitoring requirements.
L001	Cold cleaner operated with cover	21-09(O)(2)		N	Y	N	N	N	N	N	N	N	N	N	OR - Cold cleaner operated with cover M&R - There is no monitoring or record keeping associated with this rule. Rp - There is no reporting requirements associated with this rule. ET - Compliance assured by good engineering practices and inspections.
L001	Cold cleaner equipped with device for draining	21-09(O)(2)		N	Y	Y	N	N	Y	N	N	N	N	N	OR - Cold cleaner shall be equipped with a device for draining; clean parts shall drain until dripping ceases. M&R - Monitoring for vapor pressure of solvent, types of solvents and temperature at operation. Rp - There is no reporting requirements associated with this rule. ET - Compliance assured by good engineering practices and inspections.
L001	Freeboard ration of greater than or equal to 0.7.	21-09(O)(2)		N	Y	N	N	N	N	N	N	N	Y	N	OR - Freeboard ration of greater than or equal to 0.7 shall be maintained. M&R - There is no monitoring and record keeping associated with this rule. Rp - There is no reporting requirements associated with this rule. ET - Compliance assured by measuring the freeboard ratio. The freeboard ration is determined by dividing the height by the width.

L001	Vapor pressure shall not exceed 1.0 mmHg at 20 degrees Celsius	21-09(O)(2)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Vapor pressure shall not exceed 1.0 mmHg at 20 degrees Celsius. M&R - Vapor pressure of each solvent at 20 degrees Celsius. Rp- Quarterly deviation reports for any time operating with a vapor pressure greater than 1.0 mmHG at 20 degrees Celsius. ET - Compliance ensured by maintaining monitoring requirements.

EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

C **Instructions for Part III:**

C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

  When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate

column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
4. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.