State of Ohio Environmental Protection Agency

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

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

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

05/23/03

RE: Proposed Title V Chapter 3745-77 Permit
14-31-37-0116
Dinagraphics

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

Dear Ms. Damico:

The proposed issuance of the Title V permit for Dinagraphics, has been created in Ohio EPA's State Air Resources System (STARS) on 05/23/03, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Michael W. Ahern

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

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

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 05/23/03	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: 14-31-37-0116 to:
Dinagraphics
4500 Beech Street
Norwood, OH 45212-1049

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

K004 (Press # 67)
Roto Gravure Printing Press with 8 printer stations using 95% organic solvent based inks and 5% water based inks. Apply wet inks to paper substrate which are dried in overhead ovens. Solvent laden vapors are ducted to a regenerative thermal oxidizer.

K005 (Press # 101)
Roto Gravure Printing Press with 10 printer stations using 95% organic solvent based inks and 5% water based inks. Apply wet inks to paper substrate which are dried in overhead ovens. Solvent laden vapors are ducted to a regenerative thermal oxidizer.

K006 (Press # 102)
Roto Gravure Printing Press with 11 printer stations using 95% organic solvent based inks and 5% water based inks. Apply wet inks to paper substrate which are dried in overhead ovens. Solvent laden vapors are ducted to a regenerative thermal oxidizer.

K007 (Press # 103)
Roto Gravure Printing Press with 10 printer stations using 95% organic solvent based inks and 5% water based inks. Apply wet inks to paper substrate which are dried in overhead ovens. Solvent laden vapors are ducted to a regenerative thermal oxidizer. This unit has not been installed and no time frame has been established for purchase or installation as of 4/1/2003.

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

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
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, 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. 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))

ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. 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. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-

07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))

(b) 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 deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement 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. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**
Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

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))

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit(s) 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 OAC rule 3745-15-06, 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).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

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.

(Authority for term: OAC rule 3745-77-07(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 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 emission 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.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.) *(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

Each insignificant activity 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))

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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

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

3. Inspections and Information Requests

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

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with

paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. 40 CFR, Part 68 is an applicable requirement for this facility. The permittee shall comply with the Risk Management Plan submitted to the Hamilton County Department of Environmental Services.

2. Emissions units K004-K007 are subject to the requirements of 40 CFR, Part 63, Subpart A and KK. The requirements of these Subparts are specified in Part II Section A.2.a. through Section A.7.b. of this permit.

2.a The permittee shall operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95 percent for each month.

2.b The permittee shall calculate the overall organic HAP control efficiency (R) as follows:

R = (EF)/100

E = oxidizer destruction efficiency using the procedures in 40 CFR 63.827(d).

F = the capture system capture efficiency in accordance with 40 CFR 63.827(e) - (f).

3. Emissions units K004 through K007 are subject to the following operational restrictions:

3.a At all times, including periods of startup, shutdown, and malfunction, the affected source, including associated pollution control equipment shall be operated and maintained in a manner consistent with good air pollution control practices

3.b Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan.

3.c During periods of startup, shutdown, and malfunction, the affected source shall be operated and maintained in accordance with the procedures specified in the startup, shutdown, and malfunction plan.

3.d The permittee shall maintain and operate the continuous temperature monitoring device in a manner consistent with good air pollution control practices. The permittee shall ensure immediate repair or replacement of parts to correct routine or otherwise predictable malfunctions as defined in the source's startup, shutdown, and malfunction plan. The permittee shall keep the necessary parts for routine repairs of the affected equipment readily available.

3.e The permittee shall secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration; or shall ensure that any bypass line valve or damper is in the closed position through continuous monitoring of valve position.

4. Emissions units K004 through K007 are subject to the following Monitoring and/or Record Keeping Requirements:

4.a The permittee shall install, calibrate, operate and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of +/- 1 percent of the temperature being monitored in deg C or +/- 1 deg C, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone of the thermal oxidizer.

All temperature monitoring equipment shall be installed, calibrated, maintained and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

4.b The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status Report submitted pursuant to 40 CFR, Part 63, Subpart KK.

A. State and Federally Enforcable Section (continued)

4.c The permittee has demonstrated that the emissions unit is equipped with a permanent total enclosure with no natural draft openings. Thus, there is no relevant operating parameter to be monitored to demonstrate capture.

Per 40 CFR 63.828(a)(5) the permittee previously submitted a plan to USEPA which stated there was no relevant operating parameter to monitor to demonstrate capture. The permittee is following this plan since no comments were received from USEPA [40 CFR 63.828(a)(5)(iii)].

4.d The permittee shall maintain monthly records of the following information for the "affected source:"

i. The sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode, MBi.

ii. The sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode, MBj.

iii. The sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, MCi.

iv. The sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always- controlled work stations during the month, MCj.

v. The monthly organic HAP emissions shall be calculated using the equation specified in Part II Section A.11.e of Permit to Installs 14-05173 and 14-05180:

where,

H = the total monthly organic HAP usage emissions, kg.

Chi = the organic HAP content of ink or other solids-containing material, i, expressed as a weight-fraction, kg/kg.

Chj = the organic HAP content of solvent j, expressed as a weight-fraction, kg/kg.

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

F = the organic volatile matter capture efficiency of the capture system, percent.

MBi = the sum of the mass of solids-containing material, i, applied on intermittently-controllable work stations operating in bypass mode.

MBj = the sum of the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on intermittently-controllable work stations operating in bypass mode.

Mci = the sum of the mass of solids-containing material, i, applied on intermittently-controllable work stations operating in controlled mode and the mass of solids-containing material, i, applied on always-controlled work stations, in a month, kg.

Mcj = the sum of the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on intermittently-controllable work stations operating in controlled mode and the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on always-controlled work stations in a month, kg.

A. State and Federally Enforcable Section (continued)

vi. The monthly organic HAP usage shall be calculated using the equation specified in Part II Section A.11.f of Permit to Installs 14-05173 and 14-05180:

vii. The monthly overall organic HAP control efficiency shall be calculated using the following equation:

Monthly overall organic HAP control efficiency =

{1 - [H from (v) / monthly HAP usage from (vi)]} * 100

4.e The permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment.

4.f The permittee shall maintain records of the following:

i. The permittee shall maintain records of the occurrence and duration of each startup, shutdown, and malfunction of air pollution control equipment.

ii. If the actions taken by the permittee during a startup, shutdown, or malfunction are consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, the permittee shall keep records for that event that demonstrate that the procedures specified in the plan were followed. These records may take the form of a "checklist," or other effective form of recordkeeping, that confirms conformance with the startup, shutdown, and malfunction plan for that event.

iii. If the actions taken by the permittee during a startup, shutdown, or malfunction are not consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, the permittee shall maintain relevant records of the actions taken during the startup, shutdown, or malfunction.

4.g The permittee shall keep the written startup, shutdown, and malfunction plan on record to be made available for inspection, upon request, by the Director or Administrator for the life of the affected source or until the affected source is no longer subject to the provisions of 40 CFR, Part 63, Subpart KK. If the startup, shutdown, and malfunction plan is revised, the permittee shall keep the previous versions of the startup, shutdown, and malfunction plan on record, to be made available for inspection, upon request, by the Director or Administrator, for a period of 5 years after each revision to the plan.

4.h If the startup, shutdown, and malfunction plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the startup, shutdown, and malfunction plan at the time the owner or operator developed the plan, the owner or operator shall revise the startup, shutdown, and malfunction plan within 45 days after the event to include detailed procedures for operating and maintaining the source during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

A. State and Federally Enforcable Section (continued)

4.i The permittee shall maintain relevant records of the following:

i. Each period during which the continuous temperature monitoring device is malfunctioning or inoperative (including out-of-control periods).

ii. All required measurements needed to demonstrate compliance with a relevant standard (including, but not limited to, 15-minute averages of continuous temperature monitoring device data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report).

iii. All results of the continuous temperature monitoring device performance evaluations.

iv. All continuous temperature monitoring device calibration checks.

v. All adjustments and maintenance performed on the continuous temperature monitoring device.

4.j The permittee shall maintain relevant records of all maintenance performed on air pollution control equipment.

4.k The permittee shall conduct monthly inspections of the seal or closure mechanism on each bypass line valve to ensure that the valve or damper is/are maintained in the closed position and the exhaust system is not diverted through the bypass line; or the monitoring system shall be inspected at least once every month to ensure that it is functioning properly.

5. Emissions units K004 through K007 are subject to the following Reporting Requirements:

5.a If actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan, the owner or operator shall state such information in a startup, shutdown, and malfunction report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report shall consist of a letter, containing the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, that shall be submitted to the Director semiannually. The startup, shutdown, and malfunction report shall be delivered or postmarked by the 30th day following the end of each calendar half.

5.b If the actions taken by the permittee during a startup, shutdown, or malfunction are not consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, the permittee shall report such actions. The immediate report required shall consist of a telephone call [or facsimile (FAX) transmission] to the Director within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event, that contains the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shut-down, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.

5.c For those malfunctions or other events that affect the temperature monitoring device equipped with a continuous recorder and are not addressed by the startup, shutdown, and malfunction plan, the owner or operator shall report actions that are not consistent with the startup, shutdown, and malfunction plan within 24 hours after commencing actions inconsistent with the plan to the Director. The owner or operator shall send a follow-up report within 2 weeks after commencing actions inconsistent with the plan that either certifies that corrections have been made or includes a corrective action plan and schedule. The owner or operator shall provide proof that repair parts have been ordered or any other records that would indicate that the delay in making repairs is beyond his or her control.

A. State and Federally Enforcable Section (continued)

5.d The permittee shall submit an "excess emissions and continuous monitoring system performance report" and/or a "summary report" semi-annually, subject to the conditions specified in (i) or (ii), whichever is applicable for the semi-annual reporting period to the Director.

i. If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is less than 1 percent of the total operating time for the reporting period, and continuous temperature monitoring device downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report shall be submitted, and the full excess emissions and continuous monitoring system performance report need not be submitted unless required by the Director.

ii. If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is 1 percent or greater of the total operating time for the reporting period, or the total continuous temperature monitoring device downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, both the summary report and the excess emissions and continuous monitoring system performance report shall be submitted.

These reports shall be delivered or post-marked by the 30th day following the end of each calendar half. When no excess emissions or exceedances of a parameter have occurred, or a continuous temperature monitoring device has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

5.e The excess emissions and continuous monitoring system performance report shall contain the following information:

i. The date and time identifying each period during which the continuous temperature monitoring device was inoperative except for zero (low-level) and high-level checks.

ii. The date and time identifying each period during which the continuous temperature monitoring device was out of control, as defined in 40 CFR 63.8(c)(7).

iii. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during startups, shutdowns, and malfunctions of the affected source.

iv. The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during periods other than startups, shut-downs, and malfunctions of the affected source.

v. The nature and cause of any malfunction (if known).

vi. The corrective action taken or preventive measures adopted.

vii. The nature of the repairs or adjustments to the continuous temperature monitoring device that was inoperative or out of control.

viii. The total process operating time during the reporting period.

ix. The name, title, and signature of the responsible official who is certifying the accuracy of the report.

A. State and Federally Enforcable Section (continued)

5.f The summary report shall contain the following information:

i. The company name and address of the affected source.

ii. An identification of each hazardous air pollutant monitored at the affected source.

iii. The beginning and ending dates of the reporting period.

iv. A brief description of the process units.

v. The operating parameter limitation: 95 percent overall HAP control efficiency for each month.

vi. The monitoring equipment manufacturer(s) and model number(s).

vii. The date of the latest continuous temperature monitoring device certification or audit.

viii. The total operating time of the affected source during the reporting period.

ix. An emission data summary (or similar summary if the owner or operator monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of excess emissions expressed as a per-cent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/ shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

x. A continuous temperature monitoring device performance summary (or similar summary if the owner or operator monitors control system parameters), including the total continuous temperature monitoring device down-time during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of continuous temperature monitoring device downtime expressed as a percent of the total source operating time during that reporting period, and a break-down of the total continuous temperature monitoring device downtime during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/ quality control calibrations, other known causes, and other unknown causes.

xi. A description of any changes in continuous temperature monitoring device, processes, or controls since the last reporting period.

xii. The name, title, and signature of the responsible official who is certifying the accuracy of the report.

xiii. The date of the report.

6. See Part III, Section A.V, of this permit for a listing of the testing requirements for emissions units K004 through K007.

7. Emissions units K004 through K007 are subject to the following Miscellaneous Requirements:

7.a In accordance with the provisions of 40 CFR 63.830(b)(5), the provisions of 40 CFR 63.6 through 40 CFR 63.10 do not apply unless a control device is used to comply with the standards in 40 CFR 63.825. Thus, the startup, shutdown and malfunction requirements of this permit apply to the startup, shutdown and malfunction of the control equipment only.

7.b The "affected source" constitutes all product and packaging rotogravure presses at this facility.

B. State Only Enforceable Section

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

L001 parts washer with distillation unit;
T006 tank # 6;
T007 tank # 7;
T008 tank # 8;
T009 tank # 9; and
Z005 ink mixing.

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.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press # 67 (K004)

Activity Description: Roto Gravure Printing Press with 8 printer stations using 95% organic solvent based inks and 5% water based inks. Apply wet inks to paper substrate which are dried in overhead ovens. Solvent laden vapors are ducted to a regenerative thermal oxidizer.

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 - 8 Station Rotogravure Printing Press; Co. ID Rotogravure Press No. 67	OAC rule 3745-31-05 (A)(3) (PTI 14-05173 issued January 24, 2002)	Use of a total enclosure and oxidizer capable of maintaining an overall control efficiency of at least 95% by weight for VOC The requirements of this rule also include compliance with the requirements of 40 CFR, Part 63, Subpart KK and OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI 14-05173)	25.0 TPY volatile organic compounds (VOC), based on a rolling, 12-month summation See Term and Condition A.II.1. below.
	40 CFR, Part 63, Subpart A and KK	See Part II Sections A.2 - A.7 of this permit.
	OAC rule 3745-21-09(Y)(1)(b)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 63, Subpart KK.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a total enclosure and oxidizer to control emissions and compliance with 40 CFR, Part 63, Subpart KK.

II. Operational Restrictions

1. The maximum annual VOC input for this emissions unit shall not exceed 1,000,000 pounds per year, including liquid organic cleanup material, based upon a rolling, 12-month summation of the monthly VOC input rate.

II. Operational Restrictions (continued)

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status submitted pursuant to 40 CFR, Part 63, Subpart KK, whichever is lower.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

a. The total pounds of each coating, ink and cleanup material employed.

b. The VOC content, in percent by weight for each coating, ink and cleanup material employed.

c. The total VOC input, in pounds (the summation of each coating, ink, and cleanup material recorded in section a. multiplied by the corresponding VOC content recorded in section b.).

d. The rolling, 12-month summation of the total VOC input, in pounds.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status submitted pursuant to 40 CFR, Part 63, Subpart KK, whichever is lower.

b. A log of all downtime periods for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month summation total VOC input limitation in term A.II.1.

2. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, did not comply with the temperature limitation specified in term A.II.2.

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

3. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations and material usage restrictions specified in Sections A.I.1 and A.II.2 shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

2. Emission Limitations:

95%, by weight, overall control efficiency for VOC emissions
95%, by weight, overall control efficiency for HAPs emissions

Applicable Compliance Methods:

Emissions units K004 through K007 are vented to a common thermal oxidizer. The permittee shall conduct, or have conducted, emission testing for emissions units K004 through K007 in accordance with the following requirements:

a. Testing shall be conducted for the combined operation of K004, K005, K006, ad K007. Testing required by this permit shall be conducted within six months of the startup of K007, or within 2.5 years of permit issuance, whichever is sooner.

Compliance with the above emissions limitation, when testing is conducted for the combined operation of K004, K005, K006, and K007, shall be deemed to be compliance for each emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency for VOC and HAP emissions.

c. The tests 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.

d. The following test methods shall be employed to demonstrate compliance with the minimum overall control efficiency for HAPs and VOC:

VOC: Methods 1 through 4 and 25 of 40 CFR, Part 60, Appendix A, or other USEPA Reference Method with written approval from Hamilton County Environmental Services.

The overall control system efficiency for VOCs, shall be the product of the capture efficiency and the destruction efficiency (control efficiency) of the thermal oxidizer.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). 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 capture efficiency shall be determined using the test methods specified in 40 CFR, Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA 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 the use of the alternative if such approval does not contravene any other applicable requirement.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission tests.

Personnel from Ohio EPA and/or the Hamilton County Department of Environmental Services shall be permitted to witness the tests, 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 emission tests 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 tests. 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.

3. Material Usage Restrictions:

The maximum annual VOC input for this emissions unit shall not exceed 1,000,000 pounds per year including liquid organic cleanup material, based upon a rolling, 12-month summation of the VOC input figures.

Applicable Compliance Method:

Compliance with the material usage restrictions shall be determined by the record keeping requirements specified in Section A.lll.1.

4. The permittee may determine the volatile matter content of the materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR, Part 60, Appendix A, Test Methods 24 or 24A shall be used unless the permitttee can demonstrate to the satisfaction of the Ohio EPA that the formulation data is correct.

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

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: Press # 101 (K005)

Activity Description: Roto Gravure Printing Press with 10 printer stations using 95% organic solvent based inks and 5% water based inks. Apply wet inks to paper substrate which are dried in overhead ovens. Solvent laden vapors are ducted to a regenerative thermal oxidizer.

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 - 10 Station Rotogravure Printing Press; Co. ID Rotogravure Press No. 67	OAC rule 3745-31-05 (A)(3) (PTI 14-05173 issued January 24, 2002)	Use of a total enclosure and oxidizer capable of maintaining an overall control efficiency of at least 95% by weight for VOC The requirements of this rule also include compliance with the requirements of 40 CFR, Part 63, Subpart KK and OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI 14-05173)	60.0 TPY volatile organic compounds (VOC), based on a rolling, 12-month summation See Term and Condition A.II.1. below.
	40 CFR, Part 63, Subpart A and KK	See Part II Sections A.2 - A.7 of this permit.
	OAC rule 3745-21-09(Y)(1)(b)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 63, Subpart KK.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a total enclosure and oxidizer to control emissions and compliance with 40 CFR, Part 63, Subpart KK.

II. Operational Restrictions

1. The maximum annual VOC input for this emissions unit shall not exceed 2,400,000 pounds per year, including liquid organic cleanup material, based upon a rolling, 12-month summation of the monthly VOC input rate.

II. Operational Restrictions (continued)

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status submitted pursuant to 40 CFR, Part 63, Subpart KK, whichever is lower.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

a. The total pounds of each coating, ink and cleanup material employed.

b. The VOC content, in percent by weight for each coating, ink and cleanup material employed.

c. The total VOC input, in pounds (the summation of each coating, ink, and cleanup material recorded in section a. multiplied by the corresponding VOC content recorded in section b.).

d. The rolling, 12-month summation of the total VOC input, in pounds.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status submitted pursuant to 40 CFR, Part 63, Subpart KK, whichever is lower.

b. A log of all downtime periods for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month summation total VOC input limitation in term A.II.1.

2. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, did not comply with the temperature limitation specified in term A.II.2.

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

3. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations and material usage restrictions specified in Sections A.I.1 and A.II.2 shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

2. Emission Limitations:

95%, by weight, overall control efficiency for VOC emissions
95%, by weight, overall control efficiency for HAPs emissions

Applicable Compliance Methods:

Emissions units K004 through K007 are vented to a common thermal oxidizer. The permittee shall conduct, or have conducted, emission testing for emissions units K004 through K007 in accordance with the following requirements:

a. Testing shall be conducted for the combined operation of K004, K005, K006, ad K007. Testing required by this permit shall be conducted within six months of the startup of K007, or within 2.5 years of permit issuance, whichever is sooner.

Compliance with the above emissions limitation, when testing is conducted for the combined operation of K004, K005, K006, and K007, shall be deemed to be compliance for each emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency for VOC and HAP emissions.

c. The tests 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.

d. The following test methods shall be employed to demonstrate compliance with the minimum overall control efficiency for HAPs and VOC:

VOC: Methods 1 through 4 and 25 of 40 CFR, Part 60, Appendix A, or other USEPA Reference Method with written approval from Hamilton County Environmental Services.

The overall control system efficiency for VOCs, shall be the product of the capture efficiency and the destruction efficiency (control efficiency) of the thermal oxidizer.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). 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 capture efficiency shall be determined using the test methods specified in 40 CFR, Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA 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 the use of the alternative if such approval does not contravene any other applicable requirement.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission tests.

Personnel from Ohio EPA and/or the Hamilton County Department of Environmental Services shall be permitted to witness the tests, 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 emission tests 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 tests. 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.

3. Material Usage Restrictions:

The maximum annual VOC input for this emissions unit shall not exceed 2,400,000 pounds per year including liquid organic cleanup material, based upon a rolling, 12-month summation of the VOC input figures.

Applicable Compliance Method:

Compliance with the material usage restrictions shall be determined by the record keeping requirements specified in Section A.lll.1.

4. The permittee may determine the volatile matter content of the materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR, Part 60, Appendix A, Test Methods 24 or 24A shall be used unless the permitttee can demonstrate to the satisfaction of the Ohio EPA that the formulation data is correct.

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

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: Press # 102 (K006)

Activity Description: Roto Gravure Printing Press with 11 printer stations using 95% organic solvent based inks and 5% water based inks. Apply wet inks to paper substrate which are dried in overhead ovens. Solvent laden vapors are ducted to a regenerative thermal oxidizer.

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 - 11 Station Rotogravure Printing Press; Co. ID Rotogravure Press No. 102	OAC rule 3745-31-05 (A)(3) (PTI 14-05180)	Use of a total enclosure and oxidizer capable of maintaining an overall control efficiency of at least 95% by weight for VOC The requirements of this rule also include compliance with the requirements of 40 CFR, Part 63, Subpart KK and OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI 14-05180)	74.0 TPY volatile organic compounds (VOC), based on a rolling, 12-month summation See Term and Condition A.II.1. below.
	40 CFR, Part 63, Subpart A and KK	See Part II Sections A.2 - A.7 of this permit.
	OAC rule 3745-21-09(Y)(1)(b)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 63, Subpart KK.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a total enclosure and oxidizer to control emissions and compliance with 40 CFR, Part 63, Subpart KK.

II. Operational Restrictions

1. The maximum annual VOC input for this emissions unit shall not exceed 2,960,000 pounds per year, including liquid organic cleanup material, based upon a rolling, 12-month summation of the monthly VOC input rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

Month	Maximum Allowable Cumulative VOC Input, In Pounds
1	455,300
1-2	683,000
1-3	910,700
1-4	1,138,400
1-5	1,366,100
1-6	1,593,800
1-7	1,821,500
1-8	2,049,200
1-9	2,276,900
1-10	2,504,600
1-11	2,732,300
1-12	2,960,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limitation shall be based upon a rolling, 12-month summation of the monthly VOC input rate.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status submitted pursuant to 40 CFR, Part 63, Subpart KK, whichever is lower.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

a. The total pounds of each coating, ink and cleanup material employed.

b. The VOC content, in percent by weight for each coating, ink and cleanup material employed.

c. The total VOC input to this emissions unit, in pounds per month (the summation of each coating, ink, and cleanup material recorded in section a. multiplied by the corresponding VOC content recorded in section b.).

d. The rolling, 12-month summation of the total VOC input, in pounds.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

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

a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status submitted pursuant to 40 CFR, Part 63, Subpart KK, whichever is lower.

b. A log of all downtime periods for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month summation total VOC input limitation in term A.II.1.

2. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, did not comply with the temperature limitation specified in term A.II.2.

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

3. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations and material usage restrictions specified in Sections A.I.1 and A.II.2 shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

2. Emission Limitations:

95%, by weight, overall control efficiency for VOC emissions
95%, by weight, overall control efficiency for HAPs emissions

Applicable Compliance Methods:

Emissions units K004 through K007 are vented to a common thermal oxidizer. The permittee shall conduct, or have conducted, emission testing for emissions units K004 through K007 in accordance with the following requirements:

a. Testing shall be conducted for the combined operation of K004, K005, K006, ad K007. Testing required by this permit shall be conducted within six months of the startup of K007, or within 2.5 years of permit issuance, whichever is sooner.

Compliance with the above emissions limitation, when testing is conducted for the combined operation of K004, K005, K006, and K007, shall be deemed to be compliance for each emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency for VOC and HAP emissions.

c. The tests 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.

d. The following test methods shall be employed to demonstrate compliance with the minimum overall control efficiency for HAPs and VOC:

VOC: Methods 1 through 4 and 25 of 40 CFR, Part 60, Appendix A, or other USEPA Reference Method with written approval from Hamilton County Environmental Services.

The overall control system efficiency for VOCs, shall be the product of the capture efficiency and the destruction efficiency (control efficiency) of the thermal oxidizer.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). 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 capture efficiency shall be determined using the test methods specified in 40 CFR, Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA 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 the use of the alternative if such approval does not contravene any other applicable requirement.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission tests.

Personnel from Ohio EPA and/or the Hamilton County Department of Environmental Services shall be permitted to witness the tests, 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 emission tests 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 tests. 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.

3. Material Usage Restrictions:

The maximum annual VOC input for this emissions unit shall not exceed 2,960,000 pounds per year including liquid organic cleanup material, based upon a rolling, 12-month summation of the VOC input figures.

Applicable Compliance Method:

Compliance with the material usage restrictions shall be determined by the record keeping requirements specified in Section A.lll.1.

4. The permittee may determine the volatile matter content of the materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, Test Methods 24 or 24A shall be used unless the permitttee can demonstrate to the satisfaction of the Ohio EPA that the formulation data is correct.

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

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: Press # 103 (K007)

Activity Description: Roto Gravure Printing Press with 10 printer stations using 95% organic solvent based inks and 5% water based inks. Apply wet inks to paper substrate which are dried in overhead ovens. Solvent laden vapors are ducted to a regenerative thermal oxidizer. This unit has not been installed and no time frame has been established for purchase or installation as of 4/1/2003

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 - 10 Station Rotogravure Printing Press; Co. ID Rotogravure Press No. 103	OAC rule 3745-31-05 (A)(3) (PTI 14-05180)	Use of a total enclosure and oxidizer capable of maintaining an overall control efficiency of at least 95% by weight for VOC The requirements of this rule also include compliance with the requirements of 40 CFR, Part 63, Subpart KK and OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI 14-05180)	25.0 TPY volatile organic compounds (VOC), based on a rolling, 12-month summation See Term and Condition A.II.1. below.
	40 CFR, Part 63, Subpart A and KK	See Part II Sections A.2 - A.7 of this permit.
	OAC rule 3745-21-09(Y)(1)(b)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 63, Subpart KK.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a total enclosure and oxidizer to control emissions and compliance with 40 CFR, Part 63, Subpart KK.

II. Operational Restrictions

1. The maximum annual VOC input for this emissions unit shall not exceed 1,000,000 pounds per year, including liquid organic cleanup material, based upon a rolling, 12-month summation of the monthly VOC input rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

Month	Maximum Allowable Cumulative VOC Input, In Pounds
1	266,670
1-2	333,340
1-3	400,000
1-4	466,670
1-5	533,340
1-6	600,000
1-7	666,670
1-8	733,340
1-9	800,002
1-10	866,670
1-11	933,340
1-12	1,000,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limitation shall be based upon a rolling, 12-month summation of the monthly VOC input rate.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status submitted pursuant to 40 CFR, Part 63, Subpart KK, whichever is lower.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

a. The total pounds of each coating, ink and cleanup material employed.

b. The VOC content, in percent by weight for each coating, ink and cleanup material employed.

c. The total VOC input to this emissions unit, in pounds per month (the summation of each coating, ink, and cleanup material recorded in section a. multiplied by the corresponding VOC content recorded in section b.).

d. The rolling, 12-month summation of the total VOC input, in pounds.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

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

a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status submitted pursuant to 40 CFR, Part 63, Subpart KK, whichever is lower.

b. A log of all downtime periods for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month summation total VOC input limitation in term A.II.1.

2. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, did not comply with the temperature limitation specified in term A.II.2.

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

3. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations and material usage restrictions specified in Sections A.I.1 and A.II.2 shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

2. Emission Limitations:

95%, by weight, overall control efficiency for VOC emissions
95%, by weight, overall control efficiency for HAPs emissions

Applicable Compliance Methods:

Emissions units K004 through K007 are vented to a common thermal oxidizer. The permittee shall conduct, or have conducted, emission testing for emissions units K004 through K007 in accordance with the following requirements:

a. Testing shall be conducted for the combined operation of K004, K005, K006, ad K007. Testing required by this permit shall be conducted within six months of the startup of K007, or within 2.5 years of permit issuance, whichever is sooner.

Compliance with the above emissions limitation, when testing is conducted for the combined operation of K004, K005, K006, and K007, shall be deemed to be compliance for each emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency for VOC and HAP emissions.

c. The tests 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.

d. The following test methods shall be employed to demonstrate compliance with the minimum overall control efficiency for HAPs and VOC:

VOC: Methods 1 through 4 and 25 of 40 CFR, Part 60, Appendix A, or other USEPA Reference Method with written approval from Hamilton County Environmental Services.

The overall control system efficiency for VOCs, shall be the product of the capture efficiency and the destruction efficiency (control efficiency) of the thermal oxidizer.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). 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 capture efficiency shall be determined using the test methods specified in 40 CFR, Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA 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 the use of the alternative if such approval does not contravene any other applicable requirement.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission tests.

Personnel from Ohio EPA and/or the Hamilton County Department of Environmental Services shall be permitted to witness the tests, 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 emission tests 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 tests. 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.

3. Material Usage Restrictions:

The maximum annual VOC input for this emissions unit shall not exceed 1,000,000 pounds per year including liquid organic cleanup material, based upon a rolling, 12-month summation of the VOC input figures.

Applicable Compliance Method:

Compliance with the material usage restrictions shall be determined by the record keeping requirements specified in Section A.lll.1.

4. The permittee may determine the volatile matter content of the materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, Test Methods 24 or 24A shall be used unless the permitttee can demonstrate to the satisfaction of the Ohio EPA that the formulation data is correct.

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

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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