



08/03/2026

Scott Brandenburg
R.R. Donnelley & Sons Company
8740 Global Way
West Chester, OH 45069

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1409001125
Permit Number: P0138204
Permit Type: Administrative Modification
County: Butler

Yes	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (P110) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency Weekly Review and Public Notices website, [Weekly Review and Public Notices](#). A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: [eDocument Search / Ohio Environmental Protection Agency](#). Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrea Moore
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and

Southwest Ohio Air Quality Agency
1701 Patricia McCollum Way
DEPT 56
Cincinnati, OH 45237

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice appears on the Ohio EPA Weekly Review and Public Notices website, [Weekly Review and Public Notices / Ohio Environmental Protection Agency](#). You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 Via E-Mail Notification
SWOAQA; Indiana; Kentucky

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: [*Weekly Review and Public Notices / Ohio Environmental Protection Agency*](#) or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-3037 email: [*HClerk@epa.ohio.gov*](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install and Operate Administrative Modification

R.R. Donnelley & Sons Company
8740 Global Way
West Chester Twp., OH 45069

ID#: P0138204

Date of Action: 08/03/2026

Permit Desc: Admin Mod for 3 lithographic presses, 1 digital press, and 7 flexographic presses to incorporate RACT changes and move facility from NTV to FEPTIO status due to an increase in VOC emissions.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <https://ohioepa.commentinput.com> - Search by entering the permit #P0138204 in the "Search Projects" search box.

Permit Strategy Write-Up

1. Check all that apply:

☒ Synthetic Minor Determination

☐ Netting Determination

2. Source Description:

This permitting action is for an administrative modification for seven flexographic printing presses, three lithographic printing presses, and one digital printing press at R.R. Donnelley & Sons Company in West Chester Township, Ohio. Each of the listed presses is an existing unit that is currently permitted at the facility under PTIO P0122816, which is for a Non-Title V status. Potential to Emit for these sources now exceeds 100 TPY, therefore the facility will be moving to a Synthetic Minor status.

3. Facility Emissions and Attainment Status:

This R.R. Donnelley & Sons Company facility is used for printing services only. The facility is located in Butler county, Ohio. Butler, Clermont, Hamilton, Warren Counties, and Clinton Counties are attainment for all NAAQS pollutants [ozone-VOC (2015 standard), PM_{2.5}, PM₁₀, CO, NO_x, and SO₂]. (current status since 6/9/2022).

R.R. Donnelley & Sons Company was previously permitted as a Non-Title V facility. This permitting action moves the facility from a Non-Title V status up to a Federally Enforceable Permit To Install and Operate due to an increase in potential emissions. The facility will avoid Title V applicability by keeping VOC emissions facility-wide below 99.0 TPY. This permitting action also incorporates RACT changes for the lithographic and flexographic presses. These changes have not been approved for incorporation into the Ohio SIP.

4. Source Emissions:

All printing presses are a source of VOC emissions. The PTE for each emissions unit is:

K001 – 8.19 TPY

K002 – 15.44 TPY

K003 – 2.89 TPY

K004 – 8.43 TPY

K005 – 7.13 TPY

K006 – 10.37 TPY

K007 – 16.76 TPY

K009 – 10.54 TPY

K010 – 6.75 TPY

K011 – 10.54 TPY

K012 – 19.28 TPY

5. Conclusion:

It is recommended that the permit be issued in draft to make it federally enforceable.



**Environmental
Protection
Agency**

Permit Number: P0138204

Facility Name: R.R. Donnelley & Sons Company

Facility ID: 1409001125

Effective Date: To be entered upon final issuance

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant

Tons Per Year

VOC

99.0



**Environmental
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Agency**



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Protection
Agency**

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
R.R. Donnelley & Sons Company

Facility ID: 1409001125
Permit Number: P0138204
Permit Type: Administrative Modification
Issued: 08/03/2026
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

Division of Air Pollution Control



**Environmental
Protection
Agency**

Permit-to-Install and Operate
for
R.R. Donnelley & Sons Company

Table of Contents

Authorization	7
List of Commonly Used Abbreviations	10
A. Standard Terms and Conditions	11
B. Facility-Wide Terms and Conditions	15
C. Emissions Unit Terms and Conditions	19
1. K001, Komori L628 Sheetfed Press	20
2. K002, Komori L640 Sheetfed Press	27
3. K003, HP Indigo WS6000 Digital Press	35
4. K004, ABG Digicon Series 2 Flexographic Press	37
5. K005, Gallus EM280 Flexographic Press	41
6. K006, Gallus EM410 Flexographic Press	46
7. K007, Gallus ECS340 Flexographic Press	51
8. K009, Arpeco 109 Impressionist Flexographic Press	56
9. K010, Arpeco 062 Impressionist Flexographic Press	61
10. K011, Arpeco 085 Impressionist Flexographic Press	65
11. K012, KBA Rapida 105 Sheetfed Press	70

Authorization

Facility ID: 1409001125
Application Number(s): A0079153, A0079866A0079153, A0079866
Permit Number: P0138204
Permit Description: Admin Mod for 3 lithographic presses, 1 digital press, and 7 flexographic presses to incorporate RACT changes and move facility from NTV to FEPTIO status due to an increase in VOC emissions.
Permit Type: Administrative Modification
Permit Fee: \$1,650.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 08/03/2026
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation
Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page to:

R.R. Donnelley & Sons Company
8740 Global Way
West Chester Twp., OH 45069

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
1701 Patricia McCollum Way
DEPT 56
Cincinnati, OH 45237
(513)946-7777

The above-named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue
Director

Authorization (continued)

Permit Number:P0138204

Permit Description:Admin Mod for 3 lithographic presses, 1 digital press, and 7 flexographic presses to incorporate RACT changes and move facility from NTV to FEPTIO status due to an increase in VOC emissions.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K001
Company Equipment ID:	Komori L628 Sheetfed Press
Superseded Permit Number:	P0122816
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Komori L640 Sheetfed Press
Superseded Permit Number:	P0122816
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	HP Indigo WS6000 Digital Press
Superseded Permit Number:	P0122816
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	ABG Digicon Series 2 Flexographic Press
Superseded Permit Number:	P0122816
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	Gallus EM280 Flexographic Press
Superseded Permit Number:	P0122816
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K006
Company Equipment ID:	Gallus EM410 Flexographic Press
Superseded Permit Number:	P0122816
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K007
Company Equipment ID:	Gallus ECS340 Flexographic Press
Superseded Permit Number:	P0122816
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	K009
Company Equipment ID:	Arpeco 109 Impressionist Flexographic Press
Superseded Permit Number:	P0122816
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K010
Company Equipment ID:	Arpeco 062 Impressionist Flexographic Press
Superseded Permit Number:	P0122816
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K011
Company Equipment ID:	Arpeco 085 Impressionist Flexographic Press
Superseded Permit Number:	P0122816
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K012
Company Equipment ID:	KBA Rapida 105 Sheetfed Press
Superseded Permit Number:	P0122816
General Permit Category and Type:	Not Applicable

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO ₂ = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m ³ = micrograms per cubic meter

A. Standard Terms and Conditions

1. What does this permit-to-install and operate (PTIO) allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- a) PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11 or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- b) Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (either electronically through Ohio EPA's eBusiness Center: Air Services web service or postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended once by 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and permit evaluation report (PER) obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Southwest Ohio Air Quality Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his/her authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shut down emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, the new owner or operator must follow the procedures in OAC Chapter 3745-31-07, including notifying Ohio EPA or the local air agency of the change in ownership or operator within thirty days of the transfer date. Any transferee of this permit shall assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a PTI document, the facility-wide T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a PTO document, the facility-wide T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2., 3., 4., 5., and 6.
2. The total allowable VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K009, K010, K011, K012, all de minimis emissions units (as defined in OAC rule 3745-15-05), and other air contaminant sources exempt from the requirement to obtain a PTI pursuant to OAC rules 3745-31-03 and 3745-31-30 installed prior to or subsequent to the issuance of this permit, combined, shall not exceed 99.0 TPY, based upon a rolling, 12-month summation of the monthly emissions.
3. The maximum total production throughput of the emissions units listed in B.2. shall not cause VOC emissions from the emissions units, combined, to exceed 99.0 tons, as a rolling, 12-month summation, based on the following equations:

$$E_{VOC} = \sum [(C_{K001-K012})(EF_{coating})/2000 \text{ lbs}] + [(M_{K001-K012})(EF_{cleanup})/2000 \text{ lbs}] + (Misc_{VOC})$$

Where:

E_{VOC} = tons of VOC emissions per month;

C = monthly coating usage, per coating, for each emissions unit, in tons/month;

EF = VOC emission factor*, in lbs of VOC emitted/pound of VOC input;

M = Cleanup Material usage, per cleanup material, for each emissions unit, in tons/month;

Misc_{VOC} = VOC emissions from all de minimis emissions units (as defined in OAC rule 3745-15-05), and other air contaminant sources exempt from the requirement to obtain a PTI pursuant to OAC rules 3745-31-03 and 3745-31-30 installed prior to or subsequent to the issuance of this permit; and

n=12

$\sum (E_{VOC})$ is $\leq$ 99.0 tons VOC, based upon a rolling, 12-month summation of the monthly emissions

i = 1

Where:

E_{VOC} = total tons of VOC emissions per month;

n = months in the rolling 12-month summation.

*as provided in the application, submitted 7/17/2025, for FEPTIO P0138204, where the VOC emission factor is based on coating usage and cleanup material usage from the actual production in 2023.

The facility has existing information to demonstrate compliance with the rolling, 12-month limitation specified above upon permit issuance.

4. The permittee shall collect and record the following information each month for the emissions units identified in B.2.
 - a) The name and identification number for each coating and cleanup material employed.



- b) The total VOC content of each coating and cleanup material in pounds per gallon of material, as applied.
 - c) The number of gallons of each coating and cleanup material employed.
 - d) The total combined VOC usage/emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of b) multiplied by c) for each coating and cleanup material].
 - e) The updated rolling, 12-month summation of usage/emissions of VOCs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
5. The permittee shall submit quarterly deviation (excursion) reports that identify:
- a) All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - (1) emission limitation specified in B.2; and
 - (2) production restriction specified in B.3.
 - b) The probable cause of each deviation (excursion);
 - c) Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d) The magnitude and duration of each deviation (excursion).
- If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.
- The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).
6. Compliance with the emission limitation in B.2. of these terms and conditions shall be determined in accordance with the following methods:
- a) Emission Limitation:

Facility-wide VOC emissions shall be equal to or less than 99.0 TPY, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the VOC emissions limitation shall be demonstrated by the recordkeeping requirements specified in B.4.

C. Emissions Unit Terms and Conditions



1. K001, Komori L628 Sheetfed Press

Operations, Property and/or Equipment Description:

Lithographic press, non-heatset

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

(1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(5).

(2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b. and e)(3).

- b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled PTE is less than 10 TPY.
b.	OAC rule 3745-31-05(D) <i>Synthetic Minor to avoid Title V applicability</i>	See B.2. through B.6.
c.	OAC rule 3745-21-22(D)(3) <i>RACT for Control of VOC emissions from offset lithographic printing and letterpress printing facilities</i>	See b)(2)a., b)(2)b., c)(1), and c)(2).

(2) Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-21-22(D)(3), the fountain solution used in the sheet-fed offset lithographic printing press shall meet one of the following requirements:

i. If the fountain solution contains only alcohol substitutes, maintain the as-applied VOC content of the fountain solution at or below 5.0%, by weight; or

ii. If the fountain solution contains alcohol, either of the following:

(a) Maintain the as-applied VOC content of the fountain solution at or below 5.0%, by weight; or



(b) Maintain the as-applied VOC content of the fountain solution at or below 8.5%, by weight, and refrigerate the fountain solution to 60 degrees Fahrenheit or less.

b. Pursuant to OAC rule 3745-21-22(D)(6), the cleaning solution(s) used for cleaning each subject offset lithographic printing press or letterpress shall meet one of the following requirements:

i. Maintain the as-applied VOC content at or below 70%, by weight; or

ii. Maintain the as-applied VOC composite partial vapor pressure at or below 10 mmHg at 20 degrees Celsius (68 degrees Fahrenheit).

The use of cleaning solutions that do not meet b)(2)b.i. and b)(2)b.ii. above is permitted provided that the quantity used does not exceed 110 gallons over any consecutive 12-month period.

c) Operational Restrictions

(1) Pursuant to OAC rule 3745-21-22(D)(7), the permittee shall keep all solvent containers closed at all times unless filling, draining, or performing cleanup operations on the offset lithographic printing presses at this facility.

(2) Pursuant to OAC rule 3745-21-22(D)(8), the permittee shall keep all solvent-laden shop towels in closed containers when not being used on the offset lithographic printing presses at this facility.

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC rule 3745-21-22(G)(2), for an offset lithographic printing press subject to OAC rule 3745-21-22(D)(3)(b) specified in b)(2)a.ii. above, the permittee shall measure the following:

a. In accordance with OAC rule 3745-21-22(F)(2)(d), the VOC (alcohol) content, in % by weight, of any altered fountain solution employed in the press, measured at the time of alteration. The alcohol content of the fountain solution shall be measured using a hydrometer. The hydrometer shall have a visual, analog, or digital readout with an accuracy of 0.5%; and a standard solution shall be used to calibrate the hydrometer for the type of alcohol used in the fountain solution.

b. If the permittee refrigerates the fountain solution in accordance with OAC rule 3745-21-22(D)(2)(b)(ii) or (D)(3)(b)(ii), the temperature of the fountain solution, in degrees Fahrenheit, measured on a daily basis.

The permittee shall maintain records of the results of the measurements at the facility for a period of 5 years.

(2) The permittee does not maintain a recipe log for each batch of fountain solution prepared; therefore, in accordance with OAC rule 3745-21-22(G)(3)(b), the permittee shall maintain records for each batch of fountain solution prepared for use in an offset lithographic printing press as follows:

a. The volume and VOC content of each concentrated alcohol substitute, added to make the batch of fountain solution, based upon the manufacturer's laboratory analysis using U.S. EPA method 24.



- b. The volume of alcohol added to make the batch of fountain solution.
- c. The volume of water added to make the batch of fountain solution.
- d. The calculated VOC content of the final, mixed batch.
- e. The date and time the batch was prepared.

These records shall be maintained for a period of 5 years and shall be made available upon request.

For purposes of d)(2), a fountain solution that is continuously blended with an automatic mixing unit is considered to be the same batch until such time that the recipe or mix ratio is changed.

- (3) For an owner or operator not maintaining a recipe log for batch cleaning solution preparation, the permittee shall maintain records for all cleaning solutions employed in the offset lithographic printing operations at this facility in accordance with OAC rule 3745-21-22(G)(4)(b), including either the VOC content or VOC composite partial vapor pressure of each individual cleaning solution and the date and time the solution was prepared. These records shall be maintained for a period of 5 years and shall be made available upon request.
- (4) The owner or operator of a subject offset lithographic or letterpress printing press shall maintain monthly records of the following information:
 - a. The total amount, in gallons, of all the cleaning solutions employed; and
 - b. The total amount, in gallons, of all the cleaning solutions employed that exceeds the allowable VOC content or VOC composite vapor pressure.
- (5) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because the EU's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a *modification* as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes, in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1 TPY may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature



by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping, and/or testing requirements in this permit:
 - i. The requirements of Section B.
 - b. The probable cause of each deviation (excursion).
 - c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
 - d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

- (4) Pursuant to OAC rule 3745-21-22(H), the permittee shall notify the Director of any of the following exceedances of applicable requirements within 45 days after the exceedance or deviation occurs, and it shall include a copy of the record of the exceedance or deviation:
 - a. If determining alcohol content via hydrometer measurement, each hydrometer measurement that shows an exceedance of the applicable alcohol content limitation specified in OAC rules 3745-21-22(D)(3)(a) or (D)(3)(b) [see b)(2)a.].
 - b. If complying via refrigerated fountain solution, each temperature reading that shows an exceedance of the temperature limitation specified in OAC rule 3745-21-22(D)(3)(b) [see b)(2)a.ii.].
 - c. Each calculated VOC content that exceeds the VOC content limitation specified in OAC rule 3745-21-22(D)(3)(b) [see b)(2)a.ii.].
 - d. Each exceedance of the limitations for VOC content or VOC composite partial vapor pressure for cleaning solutions, as specified in OAC rule 3745-21-22(D)(6) [see b)(2)b.].
- (5) Pursuant to OAC rule 3745-21-22(J)(3), the permittee shall notify the appropriate Ohio EPA district office or local air agency in writing that the offset lithographic printing operations at this facility are subject to OAC 3745-21-22 not later than sixty days after the effective date (March 27, 2022) of this rule, providing the information specified in OAC rule 3745-21-22(J)(5).



The permittee satisfied this requirement by electronic submission of the initial notification on May 26, 2022, via Ohio EPA's eBusiness Center: Air Services.

- (6) Pursuant to OAC rule 3745-21-22(J)(6)(a), the permittee shall submit a compliance certification to the appropriate Ohio EPA district office or local air agency in writing that the offset lithographic printing operations at this facility are in compliance with the applicable requirements of OAC 3745-21-22 within thirty days after documenting compliance, providing the information specified in OAC rule 3745-21-22(J)(6)(b), where applicable.

The permittee satisfied this requirement by electronic submission of the compliance certification on March 29, 2023, via Ohio EPA's eBusiness Center: Air Services.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. **Emissions Limitation:**

Pursuant to OAC rule 3745-21-22(D)(3), the permittee shall meet one of the following for the fountain solution used on the offset lithographic printing presses at this facility:

- i. If the fountain solution contains only alcohol substitutes, maintain the as-applied VOC content of the fountain solution at or below 5.0%, by weight.
- ii. If the fountain solution contains alcohol, either of the following:
 - (a) Maintain the as-applied VOC content of the fountain solution at or below 5.0%, by weight.
 - (b) Maintain the as-applied VOC content of the fountain solution at or below 8.5%, by weight, and refrigerate the fountain solution to 60 degrees Fahrenheit or less.

Applicable Compliance Method:

Compliance with the VOC content of the as-applied fountain solution shall be determined using the methods specified in OAC rule 3745-21-22(F)(2).

For any offset lithographic printing press that is subject to the fountain solution temperature requirements of OAC rule 3745-21-22(D)(3)(b)(ii), a thermometer or other temperature detection device capable of reading to 0.5 degrees Fahrenheit shall be used to ensure that any refrigerated fountain solution reservoirs are maintained at or below sixty degrees Fahrenheit at all times.

Pursuant to OAC rule 3745-21-22(F)(2)(d), when adding alcohol to a fountain solution batch for which the VOC content has already been determined, through U.S. EPA method 24 or from documentation provided by the supplier, the permittee may determine the VOC (alcohol) content of the altered fountain solution using a hydrometer.

Compliance with the above VOC requirements for fountain solutions shall be demonstrated by the recordkeeping requirements in d)(1) and d)(2).



b. Emissions Limitation:

The permittee shall meet one of the following for each cleaning solution used for cleaning on the offset lithographic printing presses at this facility:

- i. Maintain the as-applied VOC content at or below 70%, by weight; or
- ii. Maintain the as-applied VOC composite partial vapor pressure at or below 10 mmHg at 20 degrees Celsius (68 degrees Fahrenheit).

Applicable Compliance Method:

The VOC content of cleaning solutions shall be determined using the methods specified in OAC rule 3745-21-22(F)(4).

The VOC composite partial vapor pressure of cleaning solutions shall be determined using the methods specified in OAC rule 3745-21-22(F)(5).

Compliance with the above VOC requirements for cleaning solutions shall be demonstrated by the recordkeeping requirements in d)(3).

- (2) Pursuant to OAC rule 3745-21-22(I)(1), for purposes of determining VOC emissions from offset lithographic printing operations at this facility, a portion of the VOC contained in the inks and cleaning solution is retained in the printed web or in the shop towels used for cleaning. The following retention factors shall be used:

- a. A 95% VOC retention factor shall be used for sheet-fed and non-heatset web inks printed on absorptive substrates, meaning 5% of the VOC in the ink is emitted during the printing process.
- b. A 50% VOC retention factor shall be used for cleaning solution VOC in shop towels for cleaning solutions with a VOC composite vapor pressure of no more than 10 mmHg at 20 degrees Celsius (68 degrees Fahrenheit) if the contaminated shop towels are kept in closed containers, meaning 50% of the VOC used on the shop towels is emitted during the cleaning process.

g) **Miscellaneous Requirements**

- (1) None.

2. K002, Komori L640 Sheetfed Press

Operations, Property and/or Equipment Description:

Lithographic press, non-heatset

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. d)(6).
- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)b. and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 3.5 lbs/hr and 15.44 TPY from printing and cleanup. See b)(2)a. and b)(2)d. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-22(D)(3).
b.	OAC rule 3745-31-05(D) <i>Synthetic Minor to avoid Title V applicability</i>	See B.2. through B.6.
c.	OAC rule 3745-21-22(D)(3) <i>RACT for Control of VOC emissions from offset lithographic printing and letterpress printing facilities</i>	See b)(2)b., b)(2)c., c)(1), and c)(2).



(2) Additional Terms and Conditions

- a. The hourly emission limitation for VOC is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.
- b. Pursuant to OAC rule 3745-21-22(D)(3), the fountain solution used in the sheet-fed offset lithographic printing press shall meet one of the following requirements:
 - i. If the fountain solution contains only alcohol substitutes, maintain the as-applied VOC content of the fountain solution at or below 5.0%, by weight; or
 - ii. If the fountain solution contains alcohol, either of the following:
 - (a) Maintain the as-applied VOC content of the fountain solution at or below 5.0%, by weight; or
 - (b) Maintain the as-applied VOC content of the fountain solution at or below 8.5%, by weight, and refrigerate the fountain solution to 60 degrees Fahrenheit or less.
- c. Pursuant to OAC rule 3745-21-22(D)(6), the cleaning solution(s) used for cleaning each subject offset lithographic printing press or letterpress shall meet one of the following requirements:
 - i. Maintain the as-applied VOC content at or below 70%, by weight; or
 - ii. Maintain the as-applied VOC composite partial vapor pressure at or below 10 mmHg at 20 degrees Celsius (68 degrees Fahrenheit).

The use of cleaning solutions that do not meet b)(2)c.i. and b)(2)c.ii. above is permitted provided that the quantity used does not exceed 110 gallons over any consecutive 12-month period.
- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations.

c) Operational Restrictions

- (1) Pursuant to OAC rule 3745-21-22(D)(7), the permittee shall keep all solvent containers closed at all times unless filling, draining, or performing cleanup operations on the offset lithographic printing presses at this facility.
- (2) Pursuant to OAC rule 3745-21-22(D)(8), the permittee shall keep all solvent-laden shop towels in closed containers when not being used on the offset lithographic printing presses at this facility.

d) Monitoring and/or Recordkeeping Requirements

- (1) Pursuant to OAC rule 3745-21-22(G)(2), for an offset lithographic printing press subject to OAC rule 3745-21-22(D)(3)(b) specified in b)(2)b.ii. above, the permittee shall measure the following:
 - a. In accordance with OAC rule 3745-21-22(F)(2)(d), the VOC (alcohol) content, in % by weight, of any altered fountain solution employed in the press, measured at the time of alteration. The alcohol content of the fountain solution shall be measured using a hydrometer. The hydrometer shall have a visual, analog, or digital readout with an



accuracy of 0.5%; and a standard solution shall be used to calibrate the hydrometer for the type of alcohol used in the fountain solution.

- b. If the permittee refrigerates the fountain solution in accordance with OAC rule 3745-21-22(D)(2)(b)(ii) or (D)(3)(b)(ii), the temperature of the fountain solution, in degrees Fahrenheit, measured on a daily basis.

The permittee shall maintain records of the results of the measurements at the facility for a period of 5 years.

- (2) The permittee does not maintain a recipe log for each batch of fountain solution prepared; therefore, in accordance with OAC rule 3745-21-22(G)(3)(b), the permittee shall maintain records for each batch of fountain solution prepared for use in an offset lithographic printing press as follows:

- a. The volume and VOC content of each concentrated alcohol substitute, added to make the batch of fountain solution, based upon the manufacturer's laboratory analysis using U.S. EPA method 24.
- b. The volume of alcohol added to make the batch of fountain solution.
- c. The volume of water added to make the batch of fountain solution.
- d. The calculated VOC content of the final, mixed batch.
- e. The date and time the batch was prepared.

These records shall be maintained for a period of 5 years and shall be made available upon request.

For purposes of d)(2), a fountain solution that is continuously blended with an automatic mixing unit is considered to be the same batch until such time that the recipe or mix ratio is changed.

- (3) For an owner or operator not maintaining a recipe log for batch cleaning solution preparation, the permittee shall maintain records for all cleaning solutions employed in the offset lithographic printing operations at this facility in accordance with OAC rule 3745-21-22(G)(4)(b), including either the VOC content or VOC composite partial vapor pressure of each individual cleaning solution and the date and time the solution was prepared. These records shall be maintained for a period of 5 years and shall be made available upon request.



- (4) The owner or operator of a subject offset lithographic or letterpress printing press shall maintain monthly records of the following information:
- a. The total amount, in gallons, of all the cleaning solutions employed; and
 - b. The total amount, in gallons, of all the cleaning solutions employed that exceeds the allowable VOC content or VOC composite vapor pressure.
- (5) The permittee shall collect and record the following information on a monthly basis for the printing and cleanup materials applied in this emissions unit:
- a. the company identification for each coating, ink, fountain solution concentrate, fountain solution additive, other printing material, and cleanup material employed in the printing press;
 - b. the number of gallons or pounds of each coating, ink, fountain solution concentrate, fountain solution additive, other printing material, and cleanup material employed in the press;
 - c. the VOC content of each coating, ink, fountain solution concentrate, fountain solution additive, other printing material, and cleanup material employed in the press, in pounds per gallon or weight fraction;
 - d. the retention factor used for each material; and
 - e. the total VOC emission rate for the printing press, summed from all the materials applied, in pounds or tons per month, and calculated using the following scenario as an example:

$$\text{VOC emissions} = [\text{amount of ink (pounds)} \times \text{VOC content (weight fraction)} \times (1 - \text{retention factor, as a decimal})] + [\text{amount of fountain solution (gallons)} \times \text{VOC content (pounds per gallon)}] + [\text{amount of cleaning solvent (gallons)} \times \text{VOC content (pounds per gallon)}].$$
- The monthly VOC emission rates shall be summed annually to demonstrate compliance with the annual VOC emission limitation.
- (6) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because the EU's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a *modification* as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes, in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1 TPY may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other



individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping, and/or testing requirements in this permit:
 - i. The requirements of Section B.
 - b. The probable cause of each deviation (excursion).
 - c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
 - d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

- (4) Pursuant to OAC rule 3745-21-22(H), the permittee shall notify the Director of any of the following exceedances of applicable requirements within 45 days after the exceedance or deviation occurs, and it shall include a copy of the record of the exceedance or deviation:
 - a. If determining alcohol content via hydrometer measurement, each hydrometer measurement that shows an exceedance of the applicable alcohol content limitation specified in OAC rules 3745-21-22(D)(3)(a) or (D)(3)(b) [see b)(2)b.].
 - b. If complying via refrigerated fountain solution, each temperature reading that shows an exceedance of the temperature limitation specified in OAC rule 3745-21-22(D)(3)(b) [see b)(2)b.ii.].
 - c. Each calculated VOC content that exceeds the VOC content limitation specified in OAC rule 3745-21-22(D)(3)(b) [see b)(2)b.ii.].
 - d. Each exceedance of the limitations for VOC content or VOC composite partial vapor pressure for cleaning solutions, as specified in OAC rule 3745-21-22(D)(6) [see b)(2)c.].
- (5) Pursuant to OAC rule 3745-21-22(J)(3), the permittee shall notify the appropriate Ohio EPA district office or local air agency in writing that the offset lithographic printing operations at this facility are subject to OAC 3745-21-22 not later than sixty days after the effective date



(March 27, 2022) of this rule, providing the information specified in OAC rule 3745-21-22(J)(5).

The permittee satisfied this requirement by electronic submission of the initial notification on May 26, 2022, via Ohio EPA's eBusiness Center: Air Services.

- (6) Pursuant to OAC rule 3745-21-22(J)(6)(a), the permittee shall submit a compliance certification to the appropriate Ohio EPA district office or local air agency in writing that the offset lithographic printing operations at this facility are in compliance with the applicable requirements of OAC 3745-21-22 within thirty days after documenting compliance, providing the information specified in OAC rule 3745-21-22(J)(6)(b), where applicable.

The permittee satisfied this requirement by electronic submission of the compliance certification on March 29, 2023, via Ohio EPA's eBusiness Center: Air Services.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 3.5 lbs/hr and 15.44 TPY from printing and cleanup.

Applicable Compliance Method:

The hourly and annual uncontrolled potential VOC emissions rates for emissions unit K002 were determined based on guidance found in Ohio EPA Engineering Guide #68 (Calculation of PTE for non-heatset or sheet-fed printing presses to determine eligibility for PTI exemption) and the following equations from the permittee-supplied information in the application for FEPTIO P0138204, as submitted on July 17, 2025:

$$HVOC = S \times H \times L \times W \times SQ \times VOC\% \times EF / 1,000,000 / (8760 \text{ hrs/year})$$

$$AVOC = S \times H \times L \times W \times SQ \times VOC\% \times EF / 1,000,000$$

Where:

HVOC = Hourly VOC emissions from all solutions or cleaning solvents

AVOC = Annual VOC emissions from all solutions or cleaning solvents

S = Speed (Imp/hr) of the press;

H = Hours of operation per year;

L = Sheet Length (in);

W = Sheet Width (in);

SQ = Pound of material usage per Million Square Inch;

VOC% = Percent of VOC compounds in each solution or cleaning solvent; and

EF = U.S. EPA Approved Emissions Factor for VOC retention.

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-4 and 25 as specified in 40 CFR Part 60, Appendix A.



Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(5).

b. Emissions Limitation:

Pursuant to OAC rule 3745-21-22(D)(3), the permittee shall meet one of the following for the fountain solution used on the offset lithographic printing presses at this facility:

- i. If the fountain solution contains only alcohol substitutes, maintain the as-applied VOC content of the fountain solution at or below 5.0%, by weight.
- ii. If the fountain solution contains alcohol, either of the following:
 - (a) Maintain the as-applied VOC content of the fountain solution at or below 5.0%, by weight.
 - (b) Maintain the as-applied VOC content of the fountain solution at or below 8.5%, by weight, and refrigerate the fountain solution to 60 degrees Fahrenheit or less.

Applicable Compliance Method:

Compliance with the VOC content of the as-applied fountain solution shall be determined using the methods specified in OAC rule 3745-21-22(F)(2).

For any offset lithographic printing press that is subject to the fountain solution temperature requirements of OAC rule 3745-21-22(D)(3)(b)(ii), a thermometer or other temperature detection device capable of reading to 0.5 degrees Fahrenheit shall be used to ensure that any refrigerated fountain solution reservoirs are maintained at or below sixty degrees Fahrenheit at all times.

Pursuant to OAC rule 3745-21-22(F)(2)(d), when adding alcohol to a fountain solution batch for which the VOC content has already been determined, through U.S. EPA method 24 or from documentation provided by the supplier, the permittee may determine the VOC (alcohol) content of the altered fountain solution using a hydrometer.

Compliance with the above VOC requirements for fountain solutions shall be demonstrated by the recordkeeping requirements in d)(1) and d)(2).

c. Emissions Limitation:

The permittee shall meet one of the following for each cleaning solution used for cleaning on the offset lithographic printing presses at this facility:

- i. Maintain the as-applied VOC content at or below 70%, by weight; or
- ii. Maintain the as-applied VOC composite partial vapor pressure at or below 10 mmHg at 20 degrees Celsius (68 degrees Fahrenheit).

Applicable Compliance Method:

The VOC content of cleaning solutions shall be determined using the methods specified in OAC rule 3745-21-22(F)(4).



The VOC composite partial vapor pressure of cleaning solutions shall be determined using the methods specified in OAC rule 3745-21-22(F)(5).

Compliance with the above VOC requirements for cleaning solutions shall be demonstrated by the recordkeeping requirements in d)(3).

- (2) Pursuant to OAC rule 3745-21-22(I)(1), for purposes of determining VOC emissions from offset lithographic printing operations at this facility, a portion of the VOC contained in the inks and cleaning solution is retained in the printed web or in the shop towels used for cleaning. The following retention factor shall be used:
- a. A 95% VOC retention factor shall be used for sheet-fed and non-heatset web inks printed on absorptive substrates, meaning 5% of the VOC in the ink is emitted during the printing process.
 - b. A 50% VOC retention factor shall be used for cleaning solution VOC in shop towels for cleaning solutions with a VOC composite vapor pressure of no more than 10 mmHg at 20 degrees Celsius (68 degrees Fahrenheit) if the contaminated shop towels are kept in closed containers, meaning 50% of the VOC used on the shop towels is emitted during the cleaning process.

g) Miscellaneous Requirements

- (1) None.

3. K003, HP Indigo WS6000 Digital Press

Operations, Property and/or Equipment Description:

Digital

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

(1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b. and e)(3).

- b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled PTE is less than 10 TPY.
b.	OAC rule 3745-31-05(D) <i>Synthetic Minor to avoid Title V applicability</i>	See B.2. through B.6.

(2) Additional Terms and Conditions

a. None.

- c) Operational Restrictions

(1) None.

- d) Monitoring and/or Recordkeeping Requirements

(1) None.

- e) Reporting Requirements

(1) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other



individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping, and/or testing requirements in this permit:
 - i. The requirements of Section B.
 - b. The probable cause of each deviation (excursion).
 - c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
 - d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

- f) Testing Requirements
 - (1) None.
- g) Miscellaneous Requirements
 - (1) None.

4. K004, ABG Digicon Series 2 Flexographic Press

Operations, Property and/or Equipment Description:

Flexographic, UV-cured

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. d)(2).
- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)b. and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled PTE is less than 10 TPY.
b.	OAC rule 3745-31-05(D) <i>Synthetic Minor to avoid Title V applicability</i>	See B.2. through B.6.
c.	OAC rule 3745-21-09(Y)(1) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	See b)(2)a., d)(1), and e)(2)a.
d.	OAC rule 3745-21-09(Y)(4) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	The permittee shall comply with the work practice standards for cleaning materials specified in OAC rule 3745-21-09(Y)(4)(b). See b)(2)b. and b)(2)c.



e.	OAC rule 3745-21-23 <i>RACT for control of VOC emissions from industrial solvent cleaning operations</i>	Exempt, pursuant to OAC rule 3745-21-23(A)(2)(b) for cleaning operations in the flexible package printing materials source category and which are subject to the work practice standards specified in OAC rule 3745-21-09(Y)(4).
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(2) Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-21-09(Y)(2)(d), any flexographic, packaging rotogravure, and publication rotogravure printing line which is located at this facility is exempt from the requirements of OAC rule 3745-21-09(Y)(1) due to the total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility being less than 100 tons per year.

If at any time the annual usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines exceeds 100 tons, the facility will no longer be eligible for the exemption under OAC rule 3745-21-09(Y)(2)(d) and shall comply with the requirements of OAC rule 3745-21-09(Y)(1); the notification provisions of OAC rule 3745-21-04(B)(6); and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b).

- b. Pursuant to OAC rule 3745-21-09(Y)(4)(a), the VOC emissions control and VOC content requirements in OAC rules 3745-21-09(Y)(4)(a)(i) and 3745-21-09(Y)(4)(a)(ii) do not apply to this flexographic packaging printing line due to the uncontrolled PTE for VOC emissions being less than 25 TPY.

If an emissions unit no longer qualifies as exempt, the applicable existing source provisions of OAC rule 3745-21-09(Y)(4)(a), including the notification provisions of OAC rule 3745-21-04(B)(6) and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b), shall apply to the emissions unit.

- c. Pursuant to OAC rule 3745-21-09(Y)(4)(b), the permittee shall ensure that VOC emissions from the use of VOC-containing clean-up materials on flexographic packaging printing lines are minimized by maintaining compliance with the following procedures:

- i. keep cleaning materials and used shop towels in closed containers; and
- ii. convey cleaning materials from one location to another in closed containers or pipes.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined:

- a. the name and identification number of each coating and ink, as applied;
- b. the VOC content of each coating and ink, as applied, in percent by weight (pound of VOC per pound of coating or ink);



- c. the number of pounds of each coating and ink employed; and
- d. the total VOC usage from all coatings and inks employed, in tons, which is the summation of the products of d)(1)b. multiplied by d)(1)c. for each coating and ink employed then divided by 2,000 pounds per ton.

The monthly VOC usage rates shall be summed annually to determine the annual VOC usage, in TPY, for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined.

- (2) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because the EU's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a *modification* as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes, in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above TPY may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - a. The permittee shall include a statement in the annual PER as to whether the total usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility exceeded 100 tons in the previous calendar year.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping, and/or testing requirements in this permit:
 - i. The requirements of Section B.
 - b. The probable cause of each deviation (excursion).
 - c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
 - d. The magnitude and duration of each deviation (excursion).



If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.



5. K005, Gallus EM280 Flexographic Press

Operations, Property and/or Equipment Description:

Flexographic, UV-cured

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. d)(3).
- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)b. and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 1.63 lbs/hr and 7.13 TPY from printing and cleanup. See b)(2)a. and b)(2)e. The requirements of this rule include compliance with the requirements of OAC rules 3745-31-05(D), 3745-21-09(Y)(1), and 3745-21-09(Y)(4).
b.	OAC rule 3745-31-05(D) <i>Synthetic Minor to avoid Title V applicability</i>	See B.2. through B.6.
c.	OAC rule 3745-21-09(Y)(1) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	See b)(2)b., d)(1), and e)(2)a.
d.	OAC rule 3745-21-09(Y)(4) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	The permittee shall comply with the work practice standards for cleaning materials specified in OAC rule 3745-21-09(Y)(4)(b). See b)(2)c. and b)(2)d.
e.	OAC rule 3745-21-23	Exempt, pursuant to OAC rule 3745-21-23(A)(2)(b) for cleaning operations in the flexible package printing materials source



	<i>RACT for control of VOC emissions from industrial solvent cleaning operations</i>	category and which are subject to the work practice standards specified in OAC rule 3745-21-09(Y)(4).
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(2) Additional Terms and Conditions

a. The hourly emission limitation for VOC is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

b. Pursuant to OAC rule 3745-21-09(Y)(2)(d), any flexographic, packaging rotogravure, and publication rotogravure printing line which is located at this facility is exempt from the requirements of OAC rule 3745-21-09(Y)(1) due to the total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility being less than 100 tons per year.

If at any time the annual usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines exceeds 100 tons, the facility will no longer be eligible for the exemption under OAC rule 3745-21-09(Y)(2)(d) and shall comply with the requirements of OAC rule 3745-21-09(Y)(1); the notification provisions of OAC rule 3745-21-04(B)(6); and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b).

c. Pursuant to OAC rule 3745-21-09(Y)(4)(a), the VOC emissions control and VOC content requirements in OAC rules 3745-21-09(Y)(4)(a)(i) and 3745-21-09(Y)(4)(a)(ii) do not apply to this flexographic packaging printing line due to the uncontrolled PTE for VOC emissions being less than 25 TPY.

If an emissions unit no longer qualifies as exempt, the applicable existing source provisions of OAC rule 3745-21-09(Y)(4)(a), including the notification provisions of OAC rule 3745-21-04(B)(6) and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b), shall apply to the emissions unit.

d. Pursuant to OAC rule 3745-21-09(Y)(4)(b), the permittee shall ensure that VOC emissions from the use of VOC-containing clean-up materials on flexographic packaging printing lines are minimized by maintaining compliance with the following procedures:

- i. keep cleaning materials and used shop towels in closed containers; and
- ii. convey cleaning materials from one location to another in closed containers or pipes.

e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined:



- a. the name and identification number of each coating and ink, as applied;
- b. the VOC content of each coating and ink, as applied, in percent by weight (pound of VOC per pound of coating or ink);
- c. the number of pounds of each coating and ink employed; and
- d. the total VOC usage from all coatings and inks employed, in tons, which is the summation of the products of d)(1)b. multiplied by d)(1)c. for each coating and ink employed then divided by 2,000 pounds per ton.

The monthly VOC usage rates shall be summed annually to determine the annual VOC usage, in TPY, for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined.

- (2) The permittee shall collect and record the following information on a monthly basis for the printing and cleanup materials applied in this emissions unit:

- a. the company identification for each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line;
- b. the number of gallons or pounds of each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line;
- c. the VOC content of each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line, in pounds per gallon or percent by weight; and
- d. the total VOC emission rate for the flexographic printing line, summed from all the materials applied, in pounds or tons per month, and calculated using the following scenario as an example:

VOC emissions = [amount of ink/coating/additive (gallons) x VOC content (pounds per gallon)] + [amount of cleaning solvent (gallons) x VOC content (pounds per gallon)].

The monthly VOC emission rates shall be summed annually to demonstrate compliance with the annual VOC emission limitation.

- (3) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because the EU's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a *modification* as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes, in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1 TPY may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other



individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - a. The permittee shall include a statement in the annual PER as to whether the total usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility exceeded 100 tons in the previous calendar year.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping, and/or testing requirements in this permit:
 - i. The requirements of Section B.
 - b. The probable cause of each deviation (excursion).
 - c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
 - d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

VOC emissions shall not exceed 1.63 lbs/hr and 7.13 TPY from printing and cleanup.

- Applicable Compliance Method:

The hourly and annual uncontrolled potential VOC emission rates for emissions unit K005 were determined based on the following equations from the permittee-supplied information in the application for FEPTIO P0138204, as submitted on July 17, 2025:

$$\text{HVOC} = S \times 12 \text{ in/ft} \times W \times \text{Min/Yr} \times \text{SQ} \times \text{VOC\%} / 1,000,000 / (8760 \text{ hrs/year})$$

$$\text{AVOC} = S \times 12 \text{ in/ft} \times W \times \text{Min/Yr} \times \text{SQ} \times \text{VOC\%} / 1,000,000 / (2000 \text{ lbs/ton})$$

Where:



HVOC = Hourly VOC emissions from all materials or cleaning solvents

AVOC = Annual VOC emissions from all materials or cleaning solvents

S = Speed (ft/min) of the press;

W = Sheet Width (in);

Min/Yr = Minutes of operation per year

SQ = Pound of material per Million Square Inch of coverage; and

VOC% = Percent of VOC compounds in each material or cleaning solvent.

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-4 and 25 as specified in 40 CFR Part 60, Appendix A.

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(2).

g) Miscellaneous Requirements

(1) None.

6. K006, Gallus EM410 Flexographic Press

Operations, Property and/or Equipment Description:

Flexographic, UV-cured

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. d)(3).
- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)b. and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 2.37 lbs/hr and 10.37 TPY from printing and cleanup. See b)(2)a. and b)(2)e. The requirements of this rule include compliance with the requirements of OAC rules 3745-31-05(D), 3745-21-09(Y)(1), and 3745-21-09(Y)(4).
b.	OAC rule 3745-31-05(D) <i>Synthetic Minor to avoid Title V applicability</i>	See B.2. through B.6.
c.	OAC rule 3745-21-09(Y)(1) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	See b)(2)b., d)(1), and e)(2)a.
d.	OAC rule 3745-21-09(Y)(4) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	The permittee shall comply with the work practice standards for cleaning materials specified in OAC rule 3745-21-09(Y)(4)(b). See b)(2)c. and b)(2)d.
e.	OAC rule 3745-21-23	Exempt, pursuant to OAC rule 3745-21-23(A)(2)(b) for cleaning operations in the flexible package printing materials source



	<i>RACT for control of VOC emissions from industrial solvent cleaning operations</i>	category and which are subject to the work practice standards specified in OAC rule 3745-21-09(Y)(4).
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(2) Additional Terms and Conditions

- a. The hourly emission limitation for VOC is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.
- b. Pursuant to OAC rule 3745-21-09(Y)(2)(d), any flexographic, packaging rotogravure, and publication rotogravure printing line which is located at this facility is exempt from the requirements of OAC rule 3745-21-09(Y)(1) due to the total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility being less than 100 tons per year.

If at any time the annual usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines exceeds 100 tons, the facility will no longer be eligible for the exemption under OAC rule 3745-21-09(Y)(2)(d) and shall comply with the requirements of OAC rule 3745-21-09(Y)(1); the notification provisions of OAC rule 3745-21-04(B)(6); and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b).

- c. Pursuant to OAC rule 3745-21-09(Y)(4)(a), the VOC emissions control and VOC content requirements in OAC rules 3745-21-09(Y)(4)(a)(i) and 3745-21-09(Y)(4)(a)(ii) do not apply to this flexographic packaging printing line due to the uncontrolled PTE for VOC emissions being less than 25 TPY.

If an emissions unit no longer qualifies as exempt, the applicable existing source provisions of OAC rule 3745-21-09(Y)(4)(a), including the notification provisions of OAC rule 3745-21-04(B)(6) and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b), shall apply to the emissions unit.

- d. Pursuant to OAC rule 3745-21-09(Y)(4)(b), the permittee shall ensure that VOC emissions from the use of VOC-containing clean-up materials on flexographic packaging printing lines are minimized by maintaining compliance with the following procedures:
 - i. keep cleaning materials and used shop towels in closed containers; and
 - ii. convey cleaning materials from one location to another in closed containers or pipes.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined:



- a. the name and identification number of each coating and ink, as applied;
- b. the VOC content of each coating and ink, as applied, in percent by weight (pound of VOC per pound of coating or ink);
- c. the number of pounds of each coating and ink employed;
- d. the total VOC usage from all coatings and inks employed, in tons, which is the summation of the products of d)(1)b. multiplied by d)(1)c. for each coating and ink employed then divided by 2,000 pounds per ton.

The monthly VOC usage rates shall be summed annually to determine the annual VOC usage, in TPY, for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined.

- (2) The permittee shall collect and record the following information on a monthly basis for the printing and cleanup materials applied in this emissions unit:

- a. the company identification for each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line;
- b. the number of gallons or pounds of each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line;
- c. the VOC content of each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line, in pounds per gallon or percent by weight; and
- d. the total VOC emission rate for the flexographic printing line, summed from all the materials applied, in pounds or tons per month, and calculated using the following scenario as an example:

VOC emissions = [amount of ink/coating/additive (gallons) x VOC content (pounds per gallon)] + [amount of cleaning solvent (gallons) x VOC content (pounds per gallon)].

The monthly VOC emission rates shall be summed annually to demonstrate compliance with the annual VOC emission limitation.

- (3) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because the EU's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a *modification* as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes, in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1 TPY may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other



individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- a. The permittee shall include a statement in the annual PER as to whether the total usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility exceeded 100 tons in the previous calendar year.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping, and/or testing requirements in this permit:
- i. The requirements of Section B.
- b. The probable cause of each deviation (excursion).
- c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
- d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

VOC emissions shall not exceed 2.37 lbs/hr and 10.37 TPY from printing and cleanup.

Applicable Compliance Method:

The hourly and annual uncontrolled potential VOC emission rates for emissions unit K006 were determined based on the following equations from the permittee-supplied information in the application for FEPTIO P0138204, as submitted on July 17, 2025:

$$\text{HVOC} = S \times 12 \text{ in/ft} \times W \times \text{Min/Yr} \times \text{SQ} \times \text{VOC\%} / 1,000,000 / (8760 \text{ hrs/year})$$

$$\text{AVOC} = S \times 12 \text{ in/ft} \times W \times \text{Min/Yr} \times \text{SQ} \times \text{VOC\%} / 1,000,000 / (2000 \text{ lbs/ton})$$

Where:



HVOC = Hourly VOC emissions from all materials or cleaning solvents

AVOC = Annual VOC emissions from all materials or cleaning solvents

S = Speed (ft/min) of the press;

W = Sheet Width (in);

Min/Yr = Minutes of operation per year;

SQ = Pound of material used per Million Square Inch of sheet; and

VOC% = Percent of VOC compounds in each material or cleaning solvent.

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-4 and 25 as specified in 40 CFR Part 60, Appendix A.

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(2).

g) Miscellaneous Requirements

(1) None.

7. K007, Gallus ECS340 Flexographic Press

Operations, Property and/or Equipment Description:

Flexographic, UV-cured

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

(1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3).

(2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b. and e)(3).

- b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) ORC 3704.03(T)	VOC emissions shall not exceed 1.4 tons per month averaged over a 12-month rolling period from printing and cleanup.
b.	OAC rule 3745-31-05(D) <i>Synthetic Minor to avoid Title V applicability</i>	See B.2. through B.6.
c.	OAC rule 3745-21-09(Y)(1) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	See b)(2)a., d)(1), and e)(2)a.
d.	OAC rule 3745-21-09(Y)(4) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	The permittee shall comply with the work practice standards for cleaning materials specified in OAC rule 3745-21-09(Y)(4)(b). See b)(2)b. and b)(2)c.
e.	OAC rule 3745-21-23 <i>RACT for control of VOC emissions from industrial solvent cleaning operations</i>	Exempt, pursuant to OAC rule 3745-21-23(A)(2)(b) for cleaning operations in the flexible package printing materials source category and which are subject to the work practice standards specified in OAC rule 3745-21-09(Y)(4).

(2) Additional Terms and Conditions



- a. Pursuant to OAC rule 3745-21-09(Y)(2)(d), any flexographic, packaging rotogravure, and publication rotogravure printing line which is located at this facility is exempt from the requirements of OAC rule 3745-21-09(Y)(1) due to the total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility being less than 100 tons per year.

If at any time the annual usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines exceeds 100 tons, the facility will no longer be eligible for the exemption under OAC rule 3745-21-09(Y)(2)(d) and shall comply with the requirements of OAC rule 3745-21-09(Y)(1); the notification provisions of OAC rule 3745-21-04(B)(6); and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b).

- b. Pursuant to OAC rule 3745-21-09(Y)(4)(a), the VOC emissions control and VOC content requirements in OAC rules 3745-21-09(Y)(4)(a)(i) and 3745-21-09(Y)(4)(a)(ii) do not apply to this flexographic packaging printing line due to the uncontrolled PTE for VOC emissions being less than 25 TPY.

If an emissions unit no longer qualifies as exempt, the applicable existing source provisions of OAC rule 3745-21-09(Y)(4)(a), including the notification provisions of OAC rule 3745-21-04(B)(6) and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b), shall apply to the emissions unit.

- c. Pursuant to OAC rule 3745-21-09(Y)(4)(b), the permittee shall ensure that VOC emissions from the use of VOC-containing clean-up materials on flexographic packaging printing lines are minimized by maintaining compliance with the following procedures:

- i. keep cleaning materials and used shop towels in closed containers; and
- ii. convey cleaning materials from one location to another in closed containers or pipes.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined:

- a. the name and identification number of each coating and ink, as applied;
- b. the VOC content of each coating and ink, as applied, in percent by weight (pound of VOC per pound of coating or ink);
- c. the number of pounds of each coating and ink employed;



- d. the total VOC usage from all coatings and inks employed, in tons, which is the summation of the products of d)(1)b. multiplied by d)(1)c. for each coating and ink employed then divided by 2,000 pounds per ton.

The monthly VOC usage rates shall be summed annually to determine the annual VOC usage, in TPY, for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined.

- (2) The permittee shall collect and record the following information on a monthly basis for the printing and cleanup materials applied in this emissions unit:

- a. the company identification for each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line;
- b. the number of gallons or pounds of each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line;
- c. the VOC content of each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line, in pounds per gallon or percent by weight;
- d. the total VOC emission rate for the flexographic printing line, summed from all the materials applied, in pounds or tons per month, and calculated using the following scenario as an example:

VOC emissions = [amount of ink/coating/additive (gallons) x VOC content (pounds per gallon)] + [amount of cleaning solvent (gallons) x VOC content (pounds per gallon)]; and

- e. the updated monthly average VOC emissions, in tons, for the 12-month rolling period. (This shall be calculated by summing the monthly emissions, in tons, for the current month and the preceding eleven months, then dividing by 12).

- (3) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because the EU's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a *modification* as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes, in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1 TPY may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature



by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - a. The permittee shall make a statement in the PER as to whether, or not, the total usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility exceeded 100 tons of VOC in the previous calendar year.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping, and/or testing requirements in this permit:
 - i. The requirements of Section B.
 - b. The probable cause of each deviation (excursion).
 - c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
 - d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:

VOC emissions shall not exceed 1.4 tons per month averaged over a 12-month rolling period for printing and cleanup.

Applicable Compliance Method:

The uncontrolled potential VOC emission rates for emissions unit K007 were determined based on the following equations from the permittee-supplied information in the application for FEPTIO P0138204, as submitted on July 17, 2025:

$$\text{Monthly average VOC} = S \times 12 \text{ in/ft} \times W \times \text{Min/Yr} \times \text{SQ} \times \text{VOC\%} / 1,000,000 / (2000 \text{ lbs/ton}) / (12 \text{ months/year})$$

Where:

Monthly average VOC = Monthly average VOC Emissions from all materials or cleaning solvents



S = Speed (ft/min) of the press;

W = Sheet Width (in);

Min/Yr = Minutes of operation per year;

SQ = Pound of material per Million Square Inch of coverage; and

VOC% = Percent of VOC compounds in each material or cleaning solvent.

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-4 and 25 as specified in 40 CFR Part 60, Appendix A.

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(2).

g) Miscellaneous Requirements

(1) None.



8. K009, Arpeco 109 Impressionist Flexographic Press

Operations, Property and/or Equipment Description:

Flexographic

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. d)(3).
- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)b. and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 2.41 lbs/hr and 10.54 TPY from printing and cleanup. See b)(2)a. and b)(2)e. The requirements of this rule include compliance with the requirements of OAC rules 3745-31-05(D), 3745-21-09(Y)(1), and 3745-21-09(Y)(4).
b.	OAC rule 3745-31-05(D) <i>Synthetic Minor to avoid Title V applicability</i>	See B.2. through B.6.
c.	OAC rule 3745-21-09(Y)(1) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	See b)(2)b., d)(1), and e)(2)a.
d.	OAC rule 3745-21-09(Y)(4) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	The permittee shall comply with the work practice standards for cleaning materials specified in OAC rule 3745-21-09(Y)(4)(b). See b)(2)c. and b)(2)d.
e.	OAC rule 3745-21-23	Exempt, pursuant to OAC rule 3745-21-23(A)(2)(b) for cleaning operations in the flexible package printing materials source



	<i>RACT for control of VOC emissions from industrial solvent cleaning operations</i>	category and which are subject to the work practice standards specified in OAC rule 3745-21-09(Y)(4).
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(2) Additional Terms and Conditions

- a. The hourly emission limitation for VOC is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.
- b. Pursuant to OAC rule 3745-21-09(Y)(2)(d), any flexographic, packaging rotogravure, and publication rotogravure printing line which is located at this facility is exempt from the requirements of OAC rule 3745-21-09(Y)(1) due to the total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility being less than 100 tons per year.

If at any time the annual usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines exceeds 100 tons, the facility will no longer be eligible for the exemption under OAC rule 3745-21-09(Y)(2)(d) and shall comply with the requirements of OAC rule 3745-21-09(Y)(1); the notification provisions of OAC rule 3745-21-04(B)(6); and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b).

- c. Pursuant to OAC rule 3745-21-09(Y)(4)(a), the VOC emissions control and VOC content requirements in OAC rules 3745-21-09(Y)(4)(a)(i) and 3745-21-09(Y)(4)(a)(ii) do not apply to this flexographic packaging printing line due to the uncontrolled PTE for VOC emissions being less than 25 TPY.

If an emissions unit no longer qualifies as exempt, the applicable existing source provisions of OAC rule 3745-21-09(Y)(4)(a), including the notification provisions of OAC rule 3745-21-04(B)(6) and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b), shall apply to the emissions unit.

- d. Pursuant to OAC rule 3745-21-09(Y)(4)(b), the permittee shall ensure that VOC emissions from the use of VOC-containing clean-up materials on flexographic packaging printing lines are minimized by maintaining compliance with the following procedures:

- i. keep cleaning materials and used shop towels in closed containers; and
- ii. convey cleaning materials from one location to another in closed containers or pipes.

- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements



- (1) The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined:
- the name and identification number of each coating and ink, as applied;
 - the VOC content of each coating and ink, as applied, in percent by weight (pound of VOC per pound of coating or ink);
 - the number of pounds of each coating and ink employed; and
 - the total VOC usage from all coatings and inks employed, in tons, which is the summation of the products of d)(1)b. multiplied by d)(1)c. for each coating and ink employed then divided by 2,000 pounds per ton.

The monthly VOC usage rates shall be summed annually to determine the annual VOC usage, in TPY, for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined.

- (2) The permittee shall collect and record the following information on a monthly basis for the printing and cleanup materials applied in this emissions unit:
- the company identification for each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line;
 - the number of gallons or pounds of each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line;
 - the VOC content of each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line, in pounds per gallon or percent by weight; and
 - the total VOC emission rate for the flexographic printing line, summed from all the materials applied, in pounds or tons per month, and calculated using the following scenario as an example:

VOC emissions = [amount of ink/coating/additive (gallons) x VOC content (pounds per gallon)] + [amount of cleaning solvent (gallons) x VOC content (pounds per gallon)].

The monthly VOC emission rates shall be summed annually to demonstrate compliance with the annual VOC emission limitation.

- (3) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because the EU's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a *modification* as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes, in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1 TPY may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents



through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

a. The permittee shall include a statement in the annual PER as to whether the total usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility exceeded 100 tons in the previous calendar year.

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping, and/or testing requirements in this permit:

i. The requirements of Section B.

b. The probable cause of each deviation (excursion).

c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).

d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

- (4) The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

VOC emissions shall not exceed 2.41 lbs/hr and 10.54 TPY from printing and cleanup.

Applicable Compliance Method:

The hourly and annual uncontrolled potential VOC emission rates for emissions unit K009 were determined based on the following equations from the permittee-supplied information in the application for FEPTIO P0138204, as submitted on July 17, 2025:

$$HVOC = S \times 12 \text{ in/ft} \times W \times \text{Min/Yr} \times SQ \times \text{VOC\%} / 1,000,000 / (8760 \text{ hrs/year})$$



$$AVOC = S \times 12 \text{ in/ft} \times W \times \text{Min/Yr} \times SQ \times \text{VOC\%} / 1,000,000 / (2000 \text{ lbs/ton})$$

Where:

HVOC = Hourly VOC emissions from all materials or cleaning solvents

AVOC = Annual VOC emissions from all materials or cleaning solvents

S = Speed (ft/min) of the press;

W = Sheet Width (in);

Min/Yr = Minutes of operation per year;

SQ = Pound of material used per Million Square Inch of sheet; and

VOC% = Percent of VOC compounds in each material or cleaning solvent.

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-4 and 25 as specified in 40 CFR Part 60, Appendix A.

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(2).

g) Miscellaneous Requirements

(1) None.

9. K010, Arpeco 062 Impressionist Flexographic Press

Operations, Property and/or Equipment Description:

Flexographic, UV-cured

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. d)(2).
- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)b. and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled PTE for VOC is less than 10 tons per year.
b.	OAC rule 3745-31-05(D) <i>Synthetic Minor to avoid Title V applicability</i>	See B.2. through B.6.
c.	OAC rule 3745-21-09(Y)(1) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	See b)(2)a., d)(1), and e)(2)a.
d.	OAC rule 3745-21-09(Y)(4) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	The permittee shall comply with the work practice standards for cleaning materials specified in OAC rule 3745-21-09(Y)(4)(b). See b)(2)b. and b)(2)c.
e.	OAC rule 3745-21-23 <i>RACT for control of VOC emissions from industrial solvent cleaning operations</i>	Exempt, pursuant to OAC rule 3745-21-23(A)(2)(b) for cleaning operations in the flexible package printing materials source category and which are subject to the work practice standards specified in OAC rule 3745-21-09(Y)(4).



(2) Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-21-09(Y)(2)(d), any flexographic, packaging rotogravure, and publication rotogravure printing line which is located at this facility is exempt from the requirements of OAC rule 3745-21-09(Y)(1) due to the total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility being less than 100 tons per year.

If at any time the annual usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines exceeds 100 tons, the facility will no longer be eligible for the exemption under OAC rule 3745-21-09(Y)(2)(d) and shall comply with the requirements of OAC rule 3745-21-09(Y)(1); the notification provisions of OAC rule 3745-21-04(B)(6); and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b).

- b. Pursuant to OAC rule 3745-21-09(Y)(4)(a), the VOC emissions control and VOC content requirements in OAC rules 3745-21-09(Y)(4)(a)(i) and 3745-21-09(Y)(4)(a)(ii) do not apply to this flexographic packaging printing line due to the uncontrolled PTE for VOC emissions being less than 25 TPY.

If an emissions unit no longer qualifies as exempt, the applicable existing source provisions of OAC rule 3745-21-09(Y)(4)(a), including the notification provisions of OAC rule 3745-21-04(B)(6) and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b), shall apply to the emissions unit.

- c. Pursuant to OAC rule 3745-21-09(Y)(4)(b), the permittee shall ensure that VOC emissions from the use of VOC-containing clean-up materials on flexographic packaging printing lines are minimized by maintaining compliance with the following procedures:
- i. keep cleaning materials and used shop towels in closed containers; and
 - ii. convey cleaning materials from one location to another in closed containers or pipes.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined:
- a. the name and identification number of each coating and ink, as applied;
 - b. the VOC content of each coating and ink, as applied, in percent by weight (pound of VOC per pound of coating or ink);
 - c. the number of pounds of each coating and ink employed;
 - d. the total VOC usage from all coatings and inks employed, in tons, which is the summation of the products of d)(1)b. multiplied by d)(1)c. for each coating and ink employed then divided by 2,000 pounds per ton.



The monthly VOC usage rates shall be summed annually to determine the annual VOC usage, in TPY, for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined.

- (2) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because the EU's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a *modification* as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes, in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1 TPY may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- a. The permittee shall make a statement in the PER as to whether, or not, the total usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility exceeded 100 tons of VOC in the previous calendar year.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping, and/or testing requirements in this permit:
- i. The requirements of Section B.
- b. The probable cause of each deviation (excursion).
- c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
- d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and



October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

10. K011, Arpeco 085 Impressionist Flexographic Press

Operations, Property and/or Equipment Description:

Flexographic, UV-cured

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. d)(3).
- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)b. and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 2.41 lbs/hr and 10.54 TPY from printing and cleanup. See b)(2)a. and b)(2)e. The requirements of this rule include compliance with the requirements of OAC rules 3745-31-05(D), 3745-21-09(Y)(1), and 3745-21-09(Y)(4).
b.	OAC rule 3745-31-05(D) <i>Synthetic Minor to avoid Title V applicability</i>	See B.2. through B.6.
c.	OAC rule 3745-21-09(Y)(1) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	See b)(2)b., d)(1), and e)(2)a.
d.	OAC rule 3745-21-09(Y)(4) <i>RACT for flexographic, packaging rotogravure, and publication rotogravure printing lines</i>	The permittee shall comply with the work practice standards for cleaning materials specified in OAC rule 3745-21-09(Y)(4)(b). See b)(2)c. and b)(2)d.
e.	OAC rule 3745-21-23	Exempt, pursuant to OAC rule 3745-21-23(A)(2)(b) for cleaning operations in the flexible package printing materials source



	<i>RACT for control of VOC emissions from industrial solvent cleaning operations</i>	category and which are subject to the work practice standards specified in OAC rule 3745-21-09(Y)(4).
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(2) Additional Terms and Conditions

- a. The hourly emission limitation for VOC is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.
- b. Pursuant to OAC rule 3745-21-09(Y)(2)(d), any flexographic, packaging rotogravure, and publication rotogravure printing line which is located at this facility is exempt from the requirements of OAC rule 3745-21-09(Y)(1) due to the total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility being less than 100 tons per year.

If at any time the annual usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines exceeds 100 tons, the facility will no longer be eligible for the exemption under OAC rule 3745-21-09(Y)(2)(d) and shall comply with the requirements of OAC rule 3745-21-09(Y)(1); the notification provisions of OAC rule 3745-21-04(B)(6); and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b).

- c. Pursuant to OAC rule 3745-21-09(Y)(4)(a), the VOC emissions control and VOC content requirements in OAC rules 3745-21-09(Y)(4)(a)(i) and 3745-21-09(Y)(4)(a)(ii) do not apply to this flexographic packaging printing line due to the uncontrolled PTE for VOC emissions being less than 25 TPY.

If an emissions unit no longer qualifies as exempt, the applicable existing source provisions of OAC rule 3745-21-09(Y)(4)(a), including the notification provisions of OAC rule 3745-21-04(B)(6) and the certification provisions of OAC rule 3745-21-04(B)(1)(a) and (B)(1)(b), shall apply to the emissions unit.

- d. Pursuant to OAC rule 3745-21-09(Y)(4)(b), the permittee shall ensure that VOC emissions from the use of VOC-containing clean-up materials on flexographic packaging printing lines are minimized by maintaining compliance with the following procedures:
 - i. keep cleaning materials and used shop towels in closed containers; and
 - ii. convey cleaning materials from one location to another in closed containers or pipes.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined:



- a. the name and identification number of each coating and ink, as applied;
- b. the VOC content of each coating and ink, as applied, in percent by weight (pound of VOC per pound of coating or ink);
- c. the number of pounds of each coating and ink employed;
- d. the total VOC usage from all coatings and inks employed, in tons, which is the summation of the products of d)(1)b. multiplied by d)(1)c. for each coating and ink employed then divided by 2,000 pounds per ton.

The monthly VOC usage rates shall be summed annually to determine the annual VOC usage, in TPY, for all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility, combined.

- (2) The permittee shall collect and record the following information on a monthly basis for the printing and cleanup materials applied in this emissions unit:

- a. the company identification for each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line;
- b. the number of gallons or pounds of each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line;
- c. the VOC content of each coating, ink, additive, other printing material, and cleanup material employed in the flexographic printing line, in pounds per gallon or percent by weight; and
- d. the total VOC emission rate for the flexographic printing line, summed from all the materials applied, in pounds or tons per month, and calculated using the following scenario as an example:

VOC emissions = [amount of ink/coating/additive (gallons) x VOC content (pounds per gallon)] + [amount of cleaning solvent (gallons) x VOC content (pounds per gallon)].

The monthly VOC emission rates shall be summed annually to demonstrate compliance with the annual VOC emission limitation.

- (3) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because the EU's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a *modification* as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes, in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1 TPY may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other



individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- a. The permittee shall include a statement in the annual PER as to whether the total usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility exceeded 100 tons in the previous calendar year.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping, and/or testing requirements in this permit:
- i. The requirements of Section B.
- b. The probable cause of each deviation (excursion).
- c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
- d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

VOC emissions shall not exceed 2.41 lbs/hr and 10.54 TPY from printing and cleanup.

Applicable Compliance Method:

The hourly and annual uncontrolled potential VOC emission rates for emissions unit K011 were determined based on the following equations from the permittee-supplied information in the application for FEPTIO P0138204, as submitted on July 17, 2025:

$$\text{HVOC} = S \times 12 \text{ in/ft} \times W \times \text{Min/Yr} \times \text{SQ} \times \text{VOC\%} / 1,000,000 / (8760 \text{ hrs/year})$$

$$\text{AVOC} = S \times 12 \text{ in/ft} \times W \times \text{Min/Yr} \times \text{SQ} \times \text{VOC\%} / 1,000,000 / (2000 \text{ lbs/ton})$$

Where:



HVOC = Hourly VOC emissions from all materials or cleaning solvents

AVOC = Annual VOC emissions from all materials or cleaning solvents

S = Speed (ft/min) of the press;

W = Sheet Width (in);

Min/Yr = Minutes of operation per year;

SQ = Pound of material used per Million Square Inch of sheet; and

VOC% = Percent of VOC compounds in each material or cleaning solvent.

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-4 and 25 as specified in 40 CFR Part 60, Appendix A.

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(2).

g) Miscellaneous Requirements

(1) None.

11. K012, KBA Rapida 105 Sheetfed Press

Operations, Property and/or Equipment Description:

Lithographic, non-heatset press

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. d)(6).
- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)b. and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) ORC 3704.03(T)	VOC emissions shall not exceed 1.6 tons per month averaged over a 12-month rolling period for printing and cleanup.
b.	OAC rule 3745-31-05(D) <i>Synthetic Minor to avoid Title V applicability</i>	See B.2. through B.6.
c.	OAC rule 3745-21-22(D)(3) <i>RACT for Control of VOC emissions from offset lithographic printing and letterpress printing facilities</i>	See b)(2)a., b)(2)b., c)(1), and c)(2).

- (2) Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-21-22(D)(3), the fountain solution used in the sheet-fed offset lithographic printing press shall meet one of the following requirements:
- i. If the fountain solution contains only alcohol substitutes, maintain the as-applied VOC content of the fountain solution at or below 5.0%, by weight; or
- ii. If the fountain solution contains alcohol, either of the following:
- (a) Maintain the as-applied VOC content of the fountain solution at or below 5.0%, by weight; or
- (b) Maintain the as-applied VOC content of the fountain solution at or below 8.5%, by weight, and refrigerate the fountain solution to 60 degrees Fahrenheit or less.



- b. Pursuant to OAC rule 3745-21-22(D)(6), the cleaning solution(s) used for cleaning each subject offset lithographic printing press or letterpress shall meet one of the following requirements:

- i. Maintain the as-applied VOC content at or below 70%, by weight; or
- ii. Maintain the as-applied VOC composite partial vapor pressure at or below 10 mmHg at 20 degrees Celsius (68 degrees Fahrenheit).

The use of cleaning solutions that do not meet b)(2)b.i. and b)(2)b.ii. above is permitted provided that the quantity used does not exceed 110 gallons over any consecutive 12-month period.

c) Operational Restrictions

- (1) Pursuant to OAC rule 3745-21-22(D)(7), the permittee shall keep all solvent containers closed at all times unless filling, draining, or performing cleanup operations on the offset lithographic printing presses at this facility.
- (2) Pursuant to OAC rule 3745-21-22(D)(8), the permittee shall keep all solvent-laden shop towels in closed containers when not being used on the offset lithographic printing presses at this facility.

d) Monitoring and/or Recordkeeping Requirements

- (1) Pursuant to OAC rule 3745-21-22(G)(2), for an offset lithographic printing press subject to OAC rule 3745-21-22(D)(3)(b) specified in b)(2)a.ii. above, the permittee shall measure the following:
 - a. In accordance with OAC rule 3745-21-22(F)(2)(d), the VOC (alcohol) content, in % by weight, of any altered fountain solution employed in the press, measured at the time of alteration. The alcohol content of the fountain solution shall be measured using a hydrometer. The hydrometer shall have a visual, analog, or digital readout with an accuracy of 0.5%; and a standard solution shall be used to calibrate the hydrometer for the type of alcohol used in the fountain solution.
 - b. If the permittee refrigerates the fountain solution in accordance with OAC rule 3745-21-22(D)(2)(b)(ii) or (D)(3)(b)(ii), the temperature of the fountain solution, in degrees Fahrenheit, measured on a daily basis.

The permittee shall maintain records of the results of the measurements at the facility for a period of 5 years.

- (2) The permittee does not maintain a recipe log for each batch of fountain solution prepared; therefore, in accordance with OAC rule 3745-21-22(G)(3)(b), the permittee shall maintain records for each batch of fountain solution prepared for use in an offset lithographic printing press as follows:
 - a. The volume and VOC content of each concentrated alcohol substitute, added to make the batch of fountain solution, based upon the manufacturer's laboratory analysis using U.S. EPA method 24.
 - b. The volume of alcohol added to make the batch of fountain solution.
 - c. The volume of water added to make the batch of fountain solution.



- d. The calculated VOC content of the final, mixed batch.
- e. The date and time the batch was prepared.

These records shall be maintained for a period of 5 years and shall be made available upon request.

For purposes of d)(2), a fountain solution that is continuously blended with an automatic mixing unit is considered to be the same batch until such time that the recipe or mix ratio is changed.

- (3) For an owner or operator not maintaining a recipe log for batch cleaning solution preparation, the permittee shall maintain records for all cleaning solutions employed in the offset lithographic printing operations at this facility in accordance with OAC rule 3745-21-22(G)(4)(b), including either the VOC content or VOC composite partial vapor pressure of each individual cleaning solution and the date and time the solution was prepared. These records shall be maintained for a period of 5 years and shall be made available upon request.
- (4) The owner or operator of a subject offset lithographic or letterpress printing press shall maintain monthly records of the following information:
 - a. The total amount, in gallons, of all the cleaning solutions employed; and
 - b. The total amount, in gallons, of all the cleaning solutions employed that exceeds the allowable VOC content or VOC composite vapor pressure.
- (5) The permittee shall collect and record the following information on a monthly basis for the printing and cleanup materials applied in this emissions unit:
 - a. the company identification for each coating, ink, fountain solution concentrate, fountain solution additive, other printing material, and cleanup material employed in the printing press;
 - b. the number of gallons or pounds of each coating, ink, fountain solution concentrate, fountain solution additive, other printing material, and cleanup material employed in the press;
 - c. the VOC content of each coating, ink, fountain solution concentrate, fountain solution additive, other printing material, and cleanup material employed in the press, in pounds per gallon or weight fraction;
 - d. the retention factor used for each material;
 - e. the total VOC emission rate for the printing press, summed from all the materials applied, in pounds or tons per month; and
 - f. the updated monthly average VOC emissions, in tons, for the 12-month rolling period. (This shall be calculated by summing the monthly emissions, in tons, for the current month and the preceding eleven months, then dividing by 12).
- (6) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because the EU's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a *modification* as defined by OAC rule 3745-31-01. The permittee is hereby advised



that changes, in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1 TPY may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping, and/or testing requirements in this permit:
 - i. The requirements of Section B.
 - b. The probable cause of each deviation (excursion).
 - c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
 - d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.
- (4) Pursuant to OAC rule 3745-21-22(H), the permittee shall notify the Director of any of the following exceedances of applicable requirements within 45 days after the exceedance or deviation occurs, and it shall include a copy of the record of the exceedance or deviation:
 - a. If determining alcohol content via hydrometer measurement, each hydrometer measurement that shows an exceedance of the applicable alcohol content limitation specified in OAC rules 3745-21-22(D)(3)(a) or (D)(3)(b) [see b)(2)a.].



- b. If complying via refrigerated fountain solution, each temperature reading that shows an exceedance of the temperature limitation specified in OAC rule 3745-21-22(D)(3)(b) [see b)(2)a.ii.].
 - c. Each calculated VOC content that exceeds the VOC content limitation specified in OAC rule 3745-21-22(D)(3)(b) [see b)(2)a.ii.].
 - d. Each exceedance of the limitations for VOC content or VOC composite partial vapor pressure for cleaning solutions, as specified in OAC rule 3745-21-22(D)(6) [see b)(2)b.].
- (5) Pursuant to OAC rule 3745-21-22(J)(3), the permittee shall notify the appropriate Ohio EPA district office or local air agency in writing that the offset lithographic printing operations at this facility are subject to OAC 3745-21-22 not later than sixty days after the effective date (March 27, 2022) of this rule, providing the information specified in OAC rule 3745-21-22(J)(5).

The permittee satisfied this requirement by electronic submission of the initial notification on May 26, 2022, via Ohio EPA's eBusiness Center: Air Services.

- (6) Pursuant to OAC rule 3745-21-22(J)(6)(a), the permittee shall submit a compliance certification to the appropriate Ohio EPA district office or local air agency in writing that the offset lithographic printing operations at this facility are in compliance with the applicable requirements of OAC 3745-21-22 within thirty days after documenting compliance, providing the information specified in OAC rule 3745-21-22(J)(6)(b), where applicable.

The permittee satisfied this requirement by electronic submission of the compliance certification on March 29, 2023, via Ohio EPA's eBusiness Center: Air Services.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 1.6 ton per month averaged over a 12-month rolling period for printing and cleanup.

Applicable Compliance Method:

The uncontrolled potential VOC emissions rate for this emissions unit was determined based on guidance found in Ohio EPA Engineering Guide #68 (Calculation of PTE for non-heatset or sheet-fed printing presses to determine eligibility for PTI exemption) and the following equations from the permittee-supplied information in the application for FEPTIO P0138204, as submitted on July 17, 2025:

Monthly average VOC = $S \times H \times L \times W \times SQ \times VOC\% \times EF / 1,000,000$ / (12 months/year)

Where:

Monthly average VOC = Monthly average VOC Emissions from all materials or cleaning solvents combined;

S = Speed (lmp/hr) of the press;



H = Hours of operation per year;

L = Sheet Length (in);

W = Sheet Width (in);

SQ = Pound of material usage per Million Square Inch of sheet;

VOC% = Percent of VOC compounds in each solution or cleaning solvent; and

EF = U.S. EPA Approved Emissions Factor for VOC retention.

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-4 and 25 as specified in 40 CFR Part 60, Appendix A.

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(5).

b. Emissions Limitation:

Pursuant to OAC rule 3745-21-22(D)(3), the permittee shall meet one of the following for the fountain solution used on the offset lithographic printing presses at this facility:

- i. If the fountain solution contains only alcohol substitutes, maintain the as-applied VOC content of the fountain solution at or below 5.0%, by weight.
- ii. If the fountain solution contains alcohol, either of the following:
 - (a) Maintain the as-applied VOC content of the fountain solution at or below 5.0%, by weight.
 - (b) Maintain the as-applied VOC content of the fountain solution at or below 8.5%, by weight, and refrigerate the fountain solution to 60 degrees Fahrenheit or less.

Applicable Compliance Method:

Compliance with the VOC content of the as-applied fountain solution shall be determined using the methods specified in OAC rule 3745-21-22(F)(2).

For any offset lithographic printing press that is subject to the fountain solution temperature requirements of OAC rule 3745-21-22(D)(3)(b)(ii), a thermometer or other temperature detection device capable of reading to 0.5 degrees Fahrenheit shall be used to ensure that any refrigerated fountain solution reservoirs are maintained at or below sixty degrees Fahrenheit at all times.

Pursuant to OAC rule 3745-21-22(F)(2)(d), when adding alcohol to a fountain solution batch for which the VOC content has already been determined, through U.S. EPA method 24 or from documentation provided by the supplier, the permittee may determine the VOC (alcohol) content of the altered fountain solution using a hydrometer.

Compliance with the above VOC requirements for fountain solutions shall be demonstrated by the recordkeeping requirements in d)(1) and d)(2).



c. Emissions Limitation:

The permittee shall meet one of the following for each cleaning solution used for cleaning on the offset lithographic printing presses at this facility:

- i. Maintain the as-applied VOC content at or below 70%, by weight; or
- ii. Maintain the as-applied VOC composite partial vapor pressure at or below 10 mmHg at 20 degrees Celsius (68 degrees Fahrenheit).

Applicable Compliance Method:

The VOC content of cleaning solutions shall be determined using the methods specified in OAC rule 3745-21-22(F)(4).

The VOC composite partial vapor pressure of cleaning solutions shall be determined using the methods specified in OAC rule 3745-21-22(F)(5).

Compliance with the above VOC requirements for cleaning solutions shall be demonstrated by the recordkeeping requirements in d)(3).

- (2) Pursuant to OAC rule 3745-21-22(I)(1), for purposes of determining VOC emissions from offset lithographic printing operations at this facility, a portion of the VOC contained in the inks and cleaning solution is retained in the printed web or in the shop towels used for cleaning. The following retention factor shall be used:

- a. A 95% VOC retention factor shall be used for sheet-fed and non-heatset web inks printed on absorptive substrates, meaning 5% of the VOC in the ink is emitted during the printing process.
- b. A 50% VOC retention factor shall be used for cleaning solution VOC in shop towels for cleaning solutions with a VOC composite vapor pressure of no more than 10 mmHg at 20 degrees Celsius (68 degrees Fahrenheit) if the contaminated shop towels are kept in closed containers, meaning 50% of the VOC used on the shop towels is emitted during the cleaning process.

g) **Miscellaneous Requirements**

- (1) None.