



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

RE: **FINAL PERMIT TO INSTALL MODIFICATION CERTIFIED MAIL**  
**WARREN COUNTY**  
Application No: 14-03878

	<b>TOXIC REVIEW</b>
	<b>PSD</b>
	<b>SYNTHETIC MINOR</b>
	<b>CEMS</b>
	<b>MACT</b>
	<b>NSPS</b>
	<b>NESHAPS</b>
	<b>NETTING</b>
	<b>MAJOR NON-ATTAINMENT</b>
	<b>MODELING SUBMITTED</b>
	<b>GASOLINE DISPENSING FACILITY</b>

DATE: 11/9/2000

Franklin Techpak Inc  
Gerald Parish  
203 Industrial Drive  
Franklin, OH 450050000

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

HCDES

## FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-03878

Application Number: **14-03878**APS Premise Number: **1483040357**Permit Fee: **\$200**Name of Facility: **Franklin Techpak Inc**Person to Contact: **Gerald Parish**Address: **203 Industrial Drive  
Franklin, OH 450050000**Location of proposed air contaminant source(s) [emissions unit(s)]:  
**203 Industrial Drive  
Franklin, OHIO**

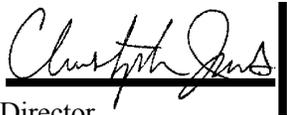
Description of modification:

**Modification of PTI #14-03878, issued 11/29/95, to increase usage of mold inhibitors & adhesives but reduce the usage of solvent based coatings/ inks and cleanup materials, no VOC change.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

**Franklin Techpak Inc**

**PTI Application: 14-03878**

**Modification Issued: 11/9/2000**

Facility ID: **1483040357**

## **GENERAL PERMIT CONDITIONS**

### **TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

### **NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

### **CONSTRUCTION OF NEW SOURCES**

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

**Franklin Techpak Inc**

**PTI Application: 14-03878**

**Modification Issued: 11/9/2000**

Facility ID: **1483040357**

### **PUBLIC DISCLOSURE**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

### **BEST AVAILABLE TECHNOLOGY**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

### **PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

### **SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

**Franklin Techpak Inc**Facility ID: **1483040357****PTI Application: 14-03878****Modification Issued: 11/9/2000****AIR EMISSION SUMMARY**

The air contaminant emissions units listed below comprise the Permit to Install for **Franklin Techpak Inc** located in **WARREN** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K001	7 - Station Flexographic Printing Press	Ink/Coating and cleanup material usage limitations. Low VOC coating research and development.	3745-31-05(BAT) 3745-15-07 3745-21-09(Y)(2)	39.7 lbs VOC/hour
K002	6 - Station Flexographic Printing Press	Ink/Coating and cleanup material usage limitations. Low VOC coating research and development.	3745-31-05(BAT) 3745-15-07 3745-21-09(Y)(2)	39.7 lbs VOC/hour

**SUMMARY****TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	19.23

**RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Cincinnati Air Pollution Control, 1632 Central Parkway, Cincinnati, Ohio 45210.

**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

**AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

**CONSTRUCTION COMPLIANCE CERTIFICATION**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

1. This facility shall not exceed the following ink, coating and cleanup material usage limits for K001 and K002 combined:

Water-based coatings/inks*	350 gallons per month and 4200 gallons per year**
Solvent-based coatings/inks	150 gallons per month and 1800 gallons per year
Mold Inhibitors	300 gallons per month and 3600 gallons per year
Cleanup Materials	30 gallons per month and 366 gallons per year
Adhesive	270 gallons per year

\*The water-based coatings/inks usage limitations may be exceeded provided that the K001/K002 Monthly and Yearly emission limits are not exceeded.

\*\*including water

2. This facility shall not exceed the following monthly emission limits for K001 and K002 combined:

Water-based coatings/inks*	330.58 pounds OC per month
Solvent-based coatings/inks	930.0 pounds OC per month
Mold Inhibitors	1788.0 pounds OC per month
Cleanup Materials	<u>56.0 pounds OC per month</u>

K001/K002 Monthly Emissions 3104.6 pounds OC per month not including the emissions from the use of adhesive.

\*The water-based coatings/inks emission limitation may be exceeded provided that the K001/K002 Monthly Emission Limit is not exceeded.

3. The VOC emissions from the use of the adhesive shall not exceed 0.60 ton per year from K001 and K002.

4. This facility shall store all rags used in the cleanup process of this source in closed containers with tightly fitted covers.

5. This facility shall initiate and pursue a coating reformulation program to develop coatings that are lower in VOC content. An annual report which documents this on-going research and development shall be submitted to the Ohio EPA field office by February 15 of each year and cover the previous calendar year (January through December).

This report shall contain, at a minimum, any letters from coatings suppliers outlining current efforts, results from any trial coating application and any projected use of an alternative coating.

6. The potential emissions [as defined by OAC 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act shall not exceed 10 TPY for any single HAP and 25 TPY for any combination of HAPs.

This facility shall maintain monthly records of the amount of emissions of any pollutant which is listed as a hazardous air pollutant in Section 112(b) of Title III of the Clean Air Act.

These records and all supporting data shall be retained in the company's files for a period of not less than three years and shall be made available to the Director, or any authorized representative of the Director during normal business hours.

This facility shall immediately notify the Ohio EPA field office of any exceedances of the above annual emission limits. A copy of the records indicating the exceedance shall be submitted within thirty (30) days of the exceedance.

7. This facility shall maintain monthly records which list the following information for each ink, surface coating and cleanup material employed in sources K001 and K002:
  - A. the company identification of the ink, surface coating or cleanup material;
  - B. the number of gallons of each ink, coating or cleanup material employed per month;
  - C. the as applied Organic Compound (OC) content in pounds of OC per gallon of each coating or cleanup material; and,
  - D. the pounds of OC emitted per month.

These monthly records, as well as any supporting coating analyses and computations, shall be retained in the company's files for a period of not less than three years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

This facility shall immediately notify the Ohio EPA field office of any coatings which are used and exceed the above limits or any exceedance of the gallon/month limit. Also, a copy of the monthly record showing the exceedance shall be submitted within thirty (30) days after the end of the calendar month.

### **Reporting Requirements**

This facility shall submit quarterly reports to the Ohio EPA field office which contains the above information. These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June, and July through September respectively).