



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
MONTGOMERY COUNTY**

**CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.  
Center

**Application No: 08-04245**

**DATE: 3/13/2001**

Monarch Marking Systems Inc  
Lloyd Goff  
PO Box 608 170 Monarch Ln  
Miamisburg, OH 45342

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

RAPCA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install**

**Issue Date: 3/13/2001**

**FINAL PERMIT TO INSTALL 08-04245**

Application Number: 08-04245  
APS Premise Number: 0857090718  
Permit Fee: **\$600**  
Name of Facility: Monarch Marking Systems Inc  
Person to Contact: Lloyd Goff  
Address: PO Box 608 170 Monarch Ln  
          Miamisburg, OH 45342

Location of proposed air contaminant source(s) [emissions unit(s)]:

**170 Monarch Ln  
Miamisburg, Ohio**

Description of proposed emissions unit(s):

**modification of K054-chapter 31 replacing 08-3487 issued 4-3-96; modification of P018 and P019-chapter 31 replacing 08-1089 issued 10-29-86.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. State and Federally Enforceable Permit To Install General Terms and Conditions**

#### **1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## **4. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## **5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

## **6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

## **7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **10. Permit To Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

## **11. 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.

## **B. State Only Enforceable Permit To Install General Terms and Conditions**

### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Permit Transfers**

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

### **4. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

### **5. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

within a reasonable time a continuing program of installation or modification. 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.

#### **6. Construction of New Sources(s)**

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 the requirements of this permit or cannot meet applicable standards.

#### **7. 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.

#### **8. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other

emissions unit(s).

**9. 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.

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

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

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
organic compounds	24.54

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K054 - 23 flexographic printing presses (Chapter 31 modification replacing PTI 08-03487 issued April 3, 1996)	OAC rule 3745-31-05(A)(3)	7.6 lbs volatile organic compounds (VOC)/hour, excluding cleanup
	OAC rule 3745-21-09(Y)(2)(b)	12.86 TPY VOC, including cleanup
		Less than or equal to 148 tons per year ink and coating usage in all flexographic, packaging rotogravure and publication rotogravure printing lines at the facility

**2. Additional Terms and Conditions**

- 2.a The 7.6 lbs/hour VOC emission limitation was developed for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.

**II. Operational Restrictions**

- 1. The maximum annual ink and coating usage in all flexographic, packaging rotogravure, and publication rotogravure printing lines at the facility shall not exceed 148 tons.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. The name and identification of each ink and coating employed.
  - b. The density of each coating and ink employed, in lbs/gallon.

- c. The number of gallons of each ink and coating employed.
- d. The total ink and coating usage for the facility, in tons (i.e., the sum of (b) x (c) for each coating and ink, divided by 2,000 lbs/ton).
- e. The VOC content of each ink, coating, and cleanup material employed, in lbs VOC/gallon.
- f. The number of gallons of each cleanup material employed.
- g. The total VOC emissions from all inks, coatings, and cleanup materials employed, in lbs/month.

#### IV. Reporting Requirements

1. The permittee shall submit annual reports which identify any exceedances of the annual ink and coating usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

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

7.6 lbs VOC/hour, excluding cleanup

Applicable Compliance Method -  
Compliance shall be determined by multiplying the sum of the maximum hourly ink usages (in gallons) for each flexographic press by the maximum VOC content of all inks employed.
  - b. Emission Limitation -  

12.86 TPY VOC, including cleanup

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in A.III.1. and shall be the sum of the twelve monthly VOC emission rates from all inks, coatings, and cleanup materials employed, divided by 2,000 lbs/ton.

c. Emission Limitation -

148 tons per year ink and coating usage

Applicable Compliance Method -  
Compliance shall be based upon the record keeping specified in A.III.1. and shall be the sum of the twelve monthly ink and coating usage rates for the calendar year.

**VI. Miscellaneous Requirements**

1. This PTI is a Chapter 31 modification replacing PTI 08-03487 issued April 3, 1996, resulting in an increase in allowable VOC emissions of 11.86 TPY.

Issued: 3/13/2001

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K054 - 23 flexographic printing presses (Chapter 31 modification replacing PTI 08-03487 issued April 3, 1996)	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

- 1. The permit to install for this emissions unit (K054) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol

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Emissions Unit ID: K054

TLV (mg/m<sup>3</sup>): 983

Maximum Hourly Emission Rate (lbs/hr): 1.48

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 16,770

MAGLC (ug/m<sup>3</sup>): 23,405

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts

Emissions Unit ID: K054

evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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**Issued: 3/13/2001**

Emissions Unit ID: K054

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P018 - mold break station (Chapter 31 modification replacing PTI 08-01089 issued October 29, 1986 and modified March 21, 1997 and July 9, 1997.)	OAC rule 3745-31-05(A)(3)	2.56 lbs/hour organic compounds (OC), excluding cleanup
	OAC rule 3745-21-07(G)(2)	32 lbs/day and 5.84 TPY OC, including cleanup  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

- 2.a The 2.56 lbs/hour OC emission limitation is being established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. The company identification for each molding and cleanup material employed.
  - b. Whether or not each cleanup material employed is a photochemically reactive material.
  - c. The number of gallons of each molding and cleanup material employed.
  - d. The OC content of each molding and cleanup material, in pounds per gallon.
  - e. The total OC emission rate for all molding and cleanup materials [summation of (c) x (d) for all materials], in pounds per day.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the organic compound emissions from the molding and cleanup materials exceeded 32 pounds per day, and the actual organic compound emissions for each such day. These quarterly deviation reports shall be submitted in accordance with Section A.1.c. of the General Terms and Conditions of this permit.
2. The permittee shall submit deviation reports which identify all periods of time during which any photochemically reactive cleanup material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the deviation occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation -  
2.56 lbs/hour OC, excluding cleanup

Emissions Unit ID: P018

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum amount of molding materials employed in an hour by the respective OC content.

b. Emission Limitation -

32 lbs/day OC, including cleanup

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.1.

c. Emission Limitation -

5.84 TPY OC, including cleanup

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.1. and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2,000 lbs/ton.

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**Issued: 3/13/2001**

Emissions Unit ID: P018

## **VI. Miscellaneous Requirements**

1. This PTI is a Chapter 31 modification replacing PTI 08-01089 issued October 29, 1986 and modified March 21, 1997 and July 9, 1997, resulting in an increase in allowable OC emissions of 3.94 TPY.

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P018 - mold break station (Chapter 31 modification replacing PTI 08-01089 issued October 29, 1986 and modified March 21, 1997 and July 9, 1997.)	None	None

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit (P018) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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**Issued: 3/13/2001**

Emissions Unit ID: P018

Pollutant: methyl isobutyl ketone

TLV (mg/m<sup>3</sup>): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 89.14

MAGLC (ug/m<sup>3</sup>): 4880

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts

Emissions Unit ID: P018

evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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**Issued: 3/13/2001**

Emissions Unit ID: P018

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P019 - mold release spray (Chapter 31 modification replacing PTI 08-01089 issued October 29, 1986 and modified March 21, 1997 and July 9, 1997.)	OAC rule 3745-31-05(A)(3)	2.56 lbs/hour organic compounds (OC), excluding cleanup
	OAC rule 3745-21-07(G)(2)	32 lbs/day and 5.84 TPY OC, including cleanup  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

- 2.a The 2.56 lbs/hour OC emission limitation is being established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.

**II. Operational Restrictions**

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. The company identification for each molding and cleanup material employed.
  - b. Whether or not each cleanup material employed is a photochemically reactive material.
  - c. The number of gallons of each molding and cleanup material employed.
  - d. The OC content of each molding and cleanup material, in pounds per gallon.
  - e. The total OC emission rate for all molding and cleanup materials [summation of (c) x (d) for all materials], in pounds per day.

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the organic compound emissions from the molding and cleanup materials exceeded 32 pounds per day, and the actual organic compound emissions for each such day. These quarterly deviation reports shall be submitted in accordance with Section A.1.c. of the General Terms and Conditions of this permit.
2. The permittee shall submit deviation reports which identify all periods of time during which any photochemically reactive cleanup material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the deviation occurs.

### **V. Testing Requirements**

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

2.56 lbs/hour OC, excluding cleanup

Applicable Compliance Method -  
Compliance shall be determined by multiplying the maximum amount of molding materials employed in an hour by the respective OC content.

b. Emission Limitation -

32 lbs/day OC, including cleanup

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.1.

c. Emission Limitation -

5.84 TPY OC, including cleanup

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.1. and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2,000 lbs/ton.

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**Issued: 3/13/2001**

Emissions Unit ID: P019

## **VI. Miscellaneous Requirements**

1. This PTI is a Chapter 31 modification replacing PTI 08-01089 issued October 29, 1986 and modified March 21, 1997 and July 9, 1997, resulting in an increase in allowable OC emissions of 4.94 TPY..

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P019 - mold release spray (Chapter 31 modification replacing PTI 08-01089 issued October 29, 1986 and modified March 21, 1997 and July 9, 1997.)	None	None

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit (P019) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Monarch Marking Systems Inc

PTI Application: **08 01215**

**Issued**

Facility ID: **0857090718**

Emissions Unit ID: P019

Pollutant: methyl isobutyl ketone

TLV (mg/m3): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 89.14

MAGLC (ug/m<sup>3</sup>): 4880

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts

evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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**Issued: 3/13/2001**

Emissions Unit ID: P019

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04245 Facility ID: 0857090718

FACILITY NAME Monarch Marking Systems Inc

FACILITY DESCRIPTION modification of K054-chapter 31 replacing 08-3487 issued 4-3-96; modification of P018 and P019-chapter 31 replacing 08-1089 issued 10-29-86. CITY/TWP Miamisburg

SIC CODE 2752 SCC CODE 4-02-013-01 EMISSIONS UNIT ID K054

EMISSIONS UNIT DESCRIPTION 23 flexographic printing presses (Chapter 31 modification replacing PTI 08-03487 issued April 3, 1996)

DATE INSTALLED June 1969 through 1986

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	7.6 lbs/hour	12.86 TPY	7.6 lbs/hour	12.86 TPY
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**BAT is compliance with the applicable OAC rules and specified allowable mass emission rates; record keeping; and reporting.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES        NOIDENTIFY THE AIR CONTAMINANTS: isopropyl alcohol

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04245

Facility ID: 0857090718

FACILITY NAME Monarch Marking Systems Inc

FACILITY DESCRIPTION modification of K054-chapter 31 replacing CITY/TWP Miamisburg

Emissions Unit ID: P019

SIC CODE 2752

SCC CODE 4-02-999-96

EMISSIONS UNIT ID P018

EMISSIONS UNIT DESCRIPTION mold break station (Chapter 31 modification replacing PTI 08-01089 issued October 29, 1986 and modified March 21, 1997 and July 9, 1997)

DATE INSTALLED June 1974

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	2.56 lbs/hour, 32 lbs/day	5.84 TPY	2.56 lbs/hour, 32 lbs/day	5.84 TPY
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the applicable OAC rules and specified allowable mass emission rates; use of non-photochemically reactive cleanup materials; record keeping; and reporting.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES        NOIDENTIFY THE AIR CONTAMINANTS: methyl isobutyl ketone

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04245

Facility ID: 0857090718

FACILITY NAME Monarch Marking Systems Inc

FACILITY DESCRIPTION modification of K054-chapter 31 replacing CITY/TWP Miamisburg

Emissions Unit ID: P019

SIC CODE 2752 SCC CODE 4-02-999-96 EMISSIONS UNIT ID P019

EMISSIONS UNIT DESCRIPTION mold release spray (Chapter 31 modification replacing PTI 08-01089 issued October 29, 1986 and modified March 21, 1997 and July 9, 1997)

DATE INSTALLED June 1974

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	2.56 lbs/hour, 32 lbs/day	5.84 TPY	2.56 lbs/hour, 32 lbs/day	5.84 TPY
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Compliance with the applicable OAC rules and specified allowable mass emission rates; use of non-photochemically reactive cleanup materials; record keeping; and reporting.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes  
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES        NO

IDENTIFY THE AIR CONTAMINANTS: methyl isobutyl ketone

**4 NEW SOURCE REVIEW FORM B**

PTI Number: 08-04245

Facility ID: 0857090718

FACILITY NAME Monarch Marking Systems Inc

FACILITY DESCRIPTION modification of K054-chanter 31 replacing CITY/TWP Miamisburg

Emissions Unit ID: P019

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to [airpti@epa.state.oh.us](mailto:airpti@epa.state.oh.us)

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	0804245c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

Monarch Marking Systems is located in Montgomery County, which is currently designated as attainment. This PTI is submitted for three emissions units at the facility that were determined to have actual annual emission rates greater than those allowed in their current PTIs. These exceedances of the annual allowable emission rates were discovered during review of the Fee Emission Report submitted for calendar year 1999. In order to bring these emissions units into compliance, the facility reviewed its records and determined that it was necessary to request an increase in the allowable emissions from these three emissions units.

Emissions unit K054 consists of twenty-three flexographic printing presses. These presses were incorporated into one emissions unit ID in the PTI issued April 3, 1996. Individually, each press is considered de minimis. In order to monitor the actual emissions from these presses, they were combined into one emissions unit ID. Additionally, the inks employed in these presses are moved from press to press such that accurate records of usage for each press cannot be maintained. With the increase in emissions, each of the twenty-three presses is still considered de minimis based upon an accurate estimate of potential emissions. The applicable rule is OAC rule 3745-21-09(Y)(2)(b) which states that any printing line which is located at a facility in which the total maximum usage of coatings and inks in all flexographic, packaging rotogravure, and publication rotogravure printing lines is less than or equal to one hundred forty-eight tons per year is not subject to the requirements of OAC rule 3745-21-09(Y)(1). The potential usage of coatings and inks in all such lines at the facility is 108 tons. Therefore, the requirements of OAC rule 3745-21-09(Y)(1) do not apply to these flexographic printing presses. Emission limitations of 7.6 lbs/hour (excluding cleanup) and 12.86 TPY (including cleanup) have been established for this emissions unit. The 7.6 lbs/hour limitation is reflective of the potential to emit for this emissions unit, determined by multiplying the maximum hourly ink usage for each press by the maximum VOC content of all inks employed on these presses. The 12.86 TPY limitation was determined based upon usage rates for the previous calendar year. The total ink usage of each type of ink was determined and the percent usage multiplied by the maximum amount of inks that can be employed in these presses. The VOC emissions from each ink were then added to the VOC emissions from other materials utilized on these presses (pH adjuster,

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04245

Facility ID: 0857090718

FACILITY NAME Monarch Marking Systems Inc

FACILITY DESCRIPTION modification of K054-chanter 31 replacing CITY/TWP Miamisburg

Emissions Unit ID: P019

varnish, and cleanup materials). Air toxics modeling was conducted for this emissions unit and compliance was demonstrated. Using a worst case emission rate of 1.48 lbs/hour (determined by multiplying the maximum hourly ink usage by the maximum isopropyl alcohol content), the maximum predicted one hour concentration was below the MAGLC for the toxic associated with this emissions unit. The toxic term has been included in the terms and conditions.

BAT for emissions unit K054 is compliance with the applicable OAC rules and specified allowable mass emission rates; record keeping; and reporting.

Emissions units P018 and P019 are mold release and break stations. These units employ the same molding materials and cleanup. Each day, the molding material is mixed and utilized on both emissions units. The applicable rule is OAC rule 3745-21-07(G)(2). The cleanup material is non-photochemically reactive and does not need to be included in the hourly allowable emission rate. A term has been included requiring that the cleanup material employed be non-photochemically reactive. Cleanup emissions have been included in the daily allowable emission rate as BAT as well as to simplify record keeping. Allowable emission rates have been established at 2.56 lbs/hour (excluding cleanup) and 32 lbs/day and 5.84 TPY OC (including cleanup) for each emissions unit. Compliance is based upon record keeping. Air toxics modeling was conducted for these emissions units and compliance was demonstrated. Using a worst case emission rate of 2.56 lbs/hour, the maximum predicted one hour concentration was below the MAGLC for all of the toxics associated with these emissions units. The toxic term has been included in the terms and conditions for these emissions units based upon the worst case toxic (methyl isobutyl ketone) which has the lowest MAGLC.

BAT for emissions units P018 and P019 is compliance with the applicable OAC rules and specified allowable mass emission rates; use of non-photochemically reactive cleanup materials; record keeping; and reporting.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or  Netting Determination  
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

<b>SUMMARY (for informational purposes only)</b>	
<b>TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS</b>	
<u>Pollutant</u>	<u>Tons Per Year</u>
organic compounds	24.54