

Facility ID: 0679000259 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0679000259 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate

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## Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

### A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
rotogravure adhesive coating line with thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 06-5925 as modified) OAC rule 3745-21-09(Y)(2)(b)	Emissions of volatile organic compounds (VOC) shall not exceed 11.2 lbs/hr, 49.0 tpy. See section A.2.a below.

### 2. Additional Terms and Conditions

- (a) The total maximum usage of coatings and inks in all flexographic, packaging rotogravure, and publication rotogravure printing lines at this facility shall not exceed 148 tpy.

### B. Operational Restrictions

1. Emissions from the coating line shall be captured and vented to the thermal incinerator. The combustion chamber temperature of the thermal incinerator shall be maintained at 1270 degrees Fahrenheit or greater during operation of this emissions unit.

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating employed during the month;
  - b. the VOC content of each coating, as applied, employed during the month, in pounds per gallon;
  - c. the number of gallons of each coating employed during the month;
  - d. the total controlled VOC emissions from all coatings employed during the month (i.e., the sum of C.1.b multiplied by C.1.c for each coating employed, in pounds or tons, multiplied by (1-X), where X is the overall control efficiency of the thermal incinerator (expressed as a decimal) based on the most recent emission test conducted for this emissions unit (currently 0.82));
  - e. the hours of operation for the line during the month; and
  - f. the average hourly controlled emission rate (i.e., C.1.d divided by C.1.e).
2. The permittee shall collect and record the total controlled VOC emissions from all coatings for each calendar year (i.e., the summation of the values obtained for C.1.d for each month in the calendar year).
3. The permittee shall collect and record the total usage of coatings, cleanup materials and inks in all flexographic, packaging rotogravure, and publication rotogravure printing lines at this facility, in tons.
4. The permittee shall operate and maintain a temperature monitor which measures the thermal incinerator combustion chamber temperature when the coating line is in operation. Units shall be in degrees Fahrenheit. The monitoring device shall be capable of accurately measuring the combustion chamber temperature. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
5. The combustion chamber temperature of the thermal incinerator shall be observed and recorded in the operating log for the coating line once during each roll of material coated. For any temperature reading less than 1270 degrees Fahrenheit, the permittee shall also record the reason for the low temperature (if known) and the corrective action(s) taken.

**D. Reporting Requirements**

1. The permittee shall submit a deviation (excursion) report to the Ohio EPA Southeast District Office if any record, as required by section C.1 of these terms and conditions, shows an exceedance of the VOC hourly emissions rate. The report shall be submitted within 30 days following the end of the calendar month in which the deviation occurred.
2. The permittee shall submit a deviation (excursion) report to the Ohio EPA Southeast District Office if any record, as required by section C.2 of these terms and conditions, shows an exceedance of the VOC annual emissions rate. The report shall be submitted by January 31 of the year following the year in which the allowable emissions rate was exceeded.
3. The permittee shall submit deviation (excursion) reports which identify all times during which the observed combustion chamber temperature within the thermal incinerator does not comply with the minimum combustion chamber temperature specified in section B.1 of these terms and conditions.
4. The permittee shall submit a deviation (excursion) report to the Ohio EPA Southeast District Office if any record, as required by section C.3 of these terms and conditions, shows total usage of coatings, cleanup materials and inks in all flexographic, packaging rotogravure, and publication rotogravure printing lines at the facility in excess of 148 tons per year. The report shall be submitted within 30 days following the end of the calendar year in which the deviation occurred.

**E. Testing Requirements**

1. Compliance with the emissions limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission limitation:  
  
11.2 pounds of VOC/hour  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated in accordance with the monthly record keeping requirements specified in section C.1 of these terms and conditions.  
  
Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the VOC content of the coatings.  
  
If required, emission tests shall be performed using USEPA Method 25 or 18.  
Emission Limitation:  
  
49.0 tons of VOC per year  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated in accordance with the monthly record keeping requirements specified in section C.2 of these terms and conditions.  
  
Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the VOC content of the coatings.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted between twelve and six months prior to expiration of this permit, unless the permittee has: (1) provided written notification to the Ohio EPA Southeast District Office that only water based coatings are being used in this emissions unit, and (2) the permittee has received prior written approval from the Ohio EPA Southeast District Office to waive this testing requirement.
  - b. The emission testing shall be conducted to demonstrate compliance with the hourly VOC emission limitation.
  - c. Test methods 1-4 and 25A of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate(s) for VOC. Incinerator control efficiency shall be determined by dividing the outlet emission rate by the total VOC input rate.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Southeast District Office. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Southeast District Office's refusal to accept the results of the emission test(s).  
  
Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.  
  
A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, from the Ohio EPA Southeast District Office.
3. Compliance with the coating and inks usage limit in Section A.2.a shall be based upon the record keeping specified in Section C.3.

4. Compliance with the minimum operating temperature restriction for the thermal incinerator shall be determined based on the record keeping specified in Section C.5.

F. **Miscellaneous Requirements**

1. None