

Facility ID: 0855050532 Issuance type: Final State Permit To Operate

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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: 0855050532 Emissions Unit ID: K001 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>
K001 - Six color flexographic printing press	OAC rule 3745-31-05(A)(3) PTI 08-04571	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 434 pounds per day. See Section A.2.a.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V) OAC rule 3745-21-09(Y)(2)(b)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B). The VOC emissions from this emissions unit shall not exceed 68.0 TPY on a 365 day rolling basis. See Section A.2.a.

2. Additional Terms and Conditions

- (a) The combined weight of ink and thinner use in this emissions unit shall not exceed 136 tons per year, and therefore the printing press is exempt from the requirements of OAC rule 21-09(Y)(1), per OAC rule 3745-21-09(Y)(2)(b).

B. Operational Restrictions

1. The VOC content of the inks used in this emissions unit shall not exceed 6.02 pounds of VOC per gallon of ink, as applied.
2. The maximum ink and thinner usage for this emissions unit shall not exceed 72 gallons per day.
3. The maximum ink and thinner usage for this emissions unit shall not exceed 22,600 gallons based upon a rolling 365-day summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each ink and thinner applied;
 - b. The volume, in gallons, of each ink and thinner applied;
 - c. The VOC content of each ink and thinner, in pounds of VOC per gallon of ink, as applied;
 - d. The total VOC emissions from all inks and thinners applied, in pounds per day, for this emissions unit, i.e., the sum of the products of "b" times "c" for each ink and thinner;
 - e. The VOC emissions from all inks and thinners applied, in tons per rolling 365-day period for this emissions unit, i.e., the sum of "d" for the day of record and the previous 364 days, or for the number of days since start-up; and
 - f. The total gallons of ink and thinner applied on a rolling 365-day basis, i.e., the sum of "b" for the date of record and the previous 364 days or for the number of days since start-up.
2. The permittee shall collect and record the following information at the end of each year for the purpose of determining annual OC emissions and for reporting requirements:

- a. The total annual ink and thinner usage from January 1 to December 31, in gallons; and
 - b. The total VOC emissions from all inks and thinners applied, in tons per year.
3. The permit to install for this emissions unit K001 was evaluated based on the actual materials (ink and thinner) employed, and the design parameters of the emissions units 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 summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Ethyl alcohol

TLV(mg/m3): 1,884,254

Maximum Hourly Emission Rate (lbs/hr): 22.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,012

MAGLC(ug/m3): 18,843

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 the 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
4. 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. Each day in which the 434 pounds of VOC per day limit was exceeded for this emissions unit;
 - b. Each day in which the combined ink and thinner usage in this emissions unit exceeded 72 gallons per day;
 - c. Each day in which the VOC content of the inks used in this emissions exceed 6.02 pounds of VOC per gallon of ink, as applied;
 - d. Following the first 365 days of operation, each day in which the rolling 365-day ink and thinner usage limitation of 22,600 gallons was exceeded as recorded in Section C.1.f; and
 - e. Following the first 365 days of operation, each day in which the rolling 365-day VOC emissions limitation of 68 tons was exceeded as recorded in Section C.1.e.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during the calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.
2. The permittee shall submit annual reports to the Director (the Regional Air Pollution Control Agency) for this emissions unit that specify:
 - a. The total annual ink and thinner usage for the calendar year, in tons; and

- b. The total VOC emissions, in tons, from all inks and thinners, as applied.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
- Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 434 pounds per day.
- Applicable Compliance Method -
Compliance shall be based upon record keeping, as specified in Section C.1.
- Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 68.0 TPY on a rolling 365-day basis.
- Applicable Compliance Method -
Compliance shall be based upon record keeping, as specified in Section C.1.
- Emission Limitation -
6.02 lbs VOC/gallon of ink as applied
- Applicable Compliance Method -
Compliance shall be based upon the records maintained as required in Sections C.1. If required, USEPA Methods 24 and 24A shall be used to determine the VOC contents for flexographic printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. Compliance with the rolling OC emissions limitations in section A.1 and the monitoring record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.b and are federally enforceable.