



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
BUTLER COUNTY**

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 14-04957

DATE: 9/14/00

Miami Packaging, Inc.
Charlie Main
1701 Reinartz Blvd
Middletown, OH 45042-0557

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 Director's 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

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: September 14, 2000
Effective Date: September 14, 2000**

FINAL PERMIT TO INSTALL 14-04957

Application Number: 14-04957
APS Premise Number: 1409010046
Permit Fee: **\$200**
Name of Facility: Miami Packaging, Inc.
Person to Contact: Charlie Main
Address: 1701 Reinartz Blvd
Middletown, OH 45042-0557

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

**1701 Reinartz Blvd
Middletown, Ohio**

Description of proposed emissions unit(s):

8 Color Rotogravure Printing Press K003 - Modification from 7 color to 8 color.

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

Miami Packaging, Inc.

Facility ID: 1409010046

PTI Application: 14-04957

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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.

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- 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.

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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

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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

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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.

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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

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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 are inadequate 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 prove to be inadequate 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. Best Available Technology

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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.

10. 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.

11. 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>
VOC	54.2

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Miami

PTI A

Emissions Unit ID: K003

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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

**Miami
PTI A**

Emissions Unit ID: K003

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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>
K003 - 8 Color Rotogravure Printing Press Controlled with a Thermal Oxidizer - Modification	40 CFR Part 63 Subpart KK	See Terms A.I.2.b
	OAC rule 3745-31-05(A)(3)	90.3* lbs VOC/hr excluding cleanup The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y) and 40 CFR Part 63 Subpart KK. *The hourly emissions limitations is based on the maximum capacity of the equipment therefore, no hourly records are required.
	OAC rule 3745-31-05(D)	54.2 TPY VOC as a rolling, 12-month summation. See Term A.II.1 and A.II.2
	OAC rule 3745-21-09(Y)	See Term A.I.2.c and A.I.2.d

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by VOC content limitations, use of a thermal oxidizer when using non-complying coatings and inks,

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compliance with emissions limitations and compliance with Air Toxics Policy.

- 2.b The total usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP as a rolling, 12-month summation and 24.9 TPY for any combination of HAPs as a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum HAP (Tons)</u>	<u>Individual maximum usage HAP usage (Tons)</u>	<u>Total Combined</u>
1	0.8	2.1	
1-2	1.7	4.2	
1-3	2.5	6.2	
1-4	3.3	8.3	
1-5	4.1	10.4	
1-6	5.0	12.5	
1-7	5.8	14.5	
1-8	6.6	16.6	
1-9	7.4	18.7	
1-10	8.3	20.8	
1-11	9.1	22.8	
1-12	9.9	24.9	

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAPs usage limitations shall be based on a rolling, 12-month summation of the usages.

- 2.c Except as provided in Term A.I.2.d below, the volatile organic compound content of the coatings, inks and thinning solvents employed in this emissions unit shall not exceed the following limitations as a daily volume weighted average:
 - i. Forty per cent VOC by volume of the coating, ink and thinning solvent, excluding water and exempt solvents; or
 - ii. Twenty-five per cent VOC by volume of the volatile matter in the coating, ink and thinning solvent.

- 2.d** When employing coatings, inks and thinning solvents with a VOC content greater than the limits specified in Term A.I.2.c above, the emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for VOC:
- i. A capture efficiency which is at least seventy percent by weight.
 - ii. A control efficiency which is at least ninety percent by weight.

II. Operational Restrictions

1. The maximum total annual VOC usage for coatings, inks and thinning solvents shall not exceed 142 TPY, based upon a rolling, 12-month summation of the usage figures.

The maximum total VOC evaporated from cleanup materials shall not exceed 3400 pounds per year based upon a rolling, 12-month summation of the usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable VOC usage for coatings, inks thinning (Tons)</u>	<u>Cumulative maximum Allowable and cumulative VOC evaporated solvents for cleanup materials (Pounds)</u>
1	11.8	283.3
1-2	23.7	566.7
1-3	35.5	850.0
1-4	47.3	1133.3
1-5	59.2	1416.7
1-6	71.0	1700.0
1-7	82.8	1983.3
1-8	94.7	2266.7
1-9	106.5	2550
1-10	118.3	2833.3
1-11	130.2	3116.7
1-12	142	3400

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC usage and evaporated limitations shall be based on a rolling, 12-month summation of the usage and/or evaporated figures.

2. When employing coatings or inks with a VOC content greater than the limits specified in Term A.I.2.c above, the average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each HAP containing material employed.
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP, in pounds of

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individual HAP per pound of material.

- c. The total combined HAP content, in pounds of combined HAPs per pound of material [sum all the individual HAP contents from (b)].
- d. The number of pounds of each HAP containing material employed.
- e. The total individual HAP usage for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material].
- f. The total combined HAP usage from all HAP containing materials, in pounds or tons per month [the sum of (c) times (d) for each material].
- g. The updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- h. The updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a individual emissions unit basis.

2. The permittee shall collect and record the following information each day for each batch in this emissions unit when the permittee employs coatings, inks and thinning solvents in compliance with the VOC content limitations in Term A.I.2.c:
 - a. The company identification of each coating, ink and thinning solvent employed in this emissions unit.
 - b. The amount of each coating, ink and thinning solvent employed in this emissions unit, in pounds.
 - c. The VOC content, C_{VOC1} , of each coating, ink and thinning solvent employed, in percent by volume of the coating and ink, excluding water and exempt solvents.
 - d. The VOC content, C_{VOC2} , of each coating, ink and thinning solvent employed, in percent

by volume of the volatile matter in the coating and ink.

- e. The VOC content of each coating, ink and thinning solvent employed, in pounds per gallon.
- f. The VOC content of each coating, ink and thinning solvent employed, in percent by weight.
- g. The liquid volume, L_{Ci} , of each coating, ink and thinning solvent employed, in gallons of coating.
- h. The volume fraction of solids (nonvolatile matter), V_{Si} , in each coating, ink and thinning solvent employed, in gallon of solids per gallon of coating.
- i. The volume fraction of volatile matter, V_{VMi} , in each coating, ink and thinning solvent employed, in gallon of volatile matter per gallon of coating.
- j. The volume fraction of water, V_{Wi} , in each coating, ink and thinning solvent employed, in gallon of water per gallon of coating.
- k. The volume fraction of exempt solvents, V_{ESi} , in each coating, ink and thinning solvent employed, in gallon of exempt solvent per gallon of coating.
- l. The volume fraction of VOC, V_{VOCi} , in each coating, ink and thinning solvent employed, calculated by taking $V_{VOCi} = V_{VMi} - V_{Wi} - V_{ESi}$.
- m. The daily volume weighted average VOC content, C_{VOC1} , in percent VOC by volume, excluding water and exempt solvents for all coating, ink and thinning solvent employed calculated by the following equation:

$$C_{VOC1} = \left\{ \sum_{i=1}^n C_{VOCi} * L_{Ci} * [V_{Si} + V_{VOCi}] \right\} / \left\{ \sum_{i=1}^n L_{Ci} * [V_{Si} + V_{VOCi}] \right\}$$

- n. The daily volume weighted average VOC content, C_{VOC2} , in percent VOC by volume of the volatile matter for all coating, ink and thinning solvent employed calculated by the following equation:

$$C_{VOC2} = \left\{ \sum_{i=1}^n C_{VOCi} * L_{Ci} * V_{VMi} \right\} / \left\{ \sum_{i=1}^n L_{Ci} * V_{VMi} \right\}$$

- o. The daily VOC emissions from all coatings, inks and thinning solvents employed calculated by taking the sum of (b) * (f) for all coatings, inks and thinning solvents employed.

3. The permittee shall collect and record the following information each month for each batch in this

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emissions unit when employing coatings, inks or thinning solvents in accordance with the limits specified in Term A.I.2.d:

- a. The company identification of each coating, ink and thinning solvent employed in this emissions unit.
 - b. The amount of each coating, ink and thinning solvent employed in this emissions unit, in pounds.
 - c. The VOC content of each coating, ink and thinning solvent employed, in percent by weight.
 - d. The monthly VOC usage for coatings, inks and thinning solvents calculated by taking the sum of (b)*(c)/100 for each coating, ink and thinning solvent employed.
 - e. The overall control efficiency based on the most recent performance test that demonstrated compliance, in percent.
4. The permittee shall collect and record the following information each month for this emissions unit:
- a. The company identification of each liquid organic cleanup material employed.
 - b. The amount of each liquid organic cleanup material employed, in pounds.
 - c. The VOC content of each liquid organic cleanup material employed, in percent by weight.
 - d. The amount of liquid organic cleanup material remaining after the cleanup operation, in pounds.
 - e. The VOC content of liquid organic cleanup material remaining after the cleanup operation, in percent by weight based on the most recent analysis of the remaining cleanup material after the cleanup operation. These analysis shall be conducted at least once per calendar quarter and the analysis records shall be maintained for the duration required by the General Terms and Conditions of this permit.
 - f. The monthly amount of VOCs evaporated from cleanup materials calculated by taking [sum of (b)*(c) for each cleanup material - sum of (d)*(e) for each cleanup material], in pounds.

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- g. The monthly VOC emissions from coatings, inks and thinning solvents calculated by taking the sum of A.III.2.o for each calendar day in the month and the sum of $(A.III.3.b) * (A.III.3.c) * [1 - (A.III.3.e / 100)]$ for all coatings, inks and thinning solvents in compliance with the requirements of term A.I.2.d..
 - h. The monthly overall VOC emissions by taking $((f) + (g)) / 2000$, in tons.
 - i. The monthly VOC usage in coatings, inks and thinning solvents calculated by adding A.III.2.o for each calendar day and A.III.3.d.
 - j. For the first 12 calendar months of operation following the issuance of this permit, the cumulative monthly VOC usage for coatings, inks and thinning solvents calculated by adding (i) for all calendar months since the issuance of this permit. After the first 12 calendar months of operation following the issuance of this permit, the updated rolling, 12-month summation of monthly VOC usage in coatings and inks calculated by adding the current month's usage to the usage for the preceding eleven calendar months.
 - k. For the first 12 calendar months of operation following the issuance of this permit, the cumulative monthly VOC evaporated in cleanup from this emissions unit calculated by adding the VOC evaporated from cleanup for all calendar months since the issuance of this permit. After the first 12 calendar months of operation following the issuance of this permit, the updated rolling, 12-month summation of monthly VOC evaporated from cleanup calculated by adding the current month's emissions to the emissions for the preceding eleven calendar months.
 - l. For the first 12 calendar months of operation following the issuance of this permit, the cumulative monthly VOC emissions from this emissions unit calculated by adding the VOC emissions for all calendar months since the issuance of this permit. After the first 12 calendar months of operation following the issuance of this permit, the updated rolling, 12-month summation of monthly VOC emissions calculated by adding the current month's emissions to the emissions for the preceding eleven calendar months.
5. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

Emissions Unit ID: K003

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in term A.I.2.b. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified in term A.II.2.
3. The permittee shall submit quarterly reports which include the following information:
 - a. The updated rolling, 12-month summation of VOC usage for coatings, inks and thinning solvents for each calendar month in the reporting period. For the first 12 calendar months following the issuance of this permit, this shall include the summation for all calendar months since the issuance of this permit.
 - b. The updated rolling, 12-month summation of VOC evaporated for cleanup for each calendar month in the reporting period. For the first 12 calendar months following the issuance of this permit, this shall include the summation for all calendar months since the issuance of this permit.
 - c. The updated rolling, 12-month summation of VOC emissions for each calendar month in the reporting period. For the first 12 calendar months following the issuance of this permit, this shall include the summation for all calendar months since the issuance of this permit.

These reports shall be submitted by January 31, April 30, July 31 and October 31 of each calendar year and shall cover the previous three calendar months.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of coatings, inks or thinning solvents not in compliance with Terms A.I.2.c. when the control device is not employed. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

Emissions Unit ID: K003

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines 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.
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 within 3 months after issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOCs.
 - c. 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 Hamilton County Department of Environmental Services.
 - d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Miami**PTI A**

Emissions Unit ID: K003

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Personnel from the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Compliance with the annual HAPs usage limitation in term A.I.2.b shall be demonstrated by the record keeping in term A.III.1
4. Compliance with the annual VOC usage & VOC evaporated cleanup limit in term A.II.1 and emissions limitation in term A.I.1 shall be based on the record keeping in term A.III.2, A.III.3 and A.III.4.
5. Compliance with the temperature restriction in term A.II.2 shall be demonstrated by the record keeping in term A.III.5

VI. Miscellaneous Requirements

None

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>
K003 - 8 Color Rotogravure Printing Press - Modification	Air Toxics Policy	See term B.III.1

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 K003 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-propyl alcohol
 TLV (ug/m3): 491,500
 Maximum Hourly Emission Rate (lbs/hr): 90.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9700.8
 MAGLC (ug/m3): 11702.4

Pollutant: 1-methoxy 2-propanol
 TLV (ug/m3): 368,600
 Maximum Hourly Emission Rate (lbs/hr): 33.3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3576.4
MAGLC (ug/m3): 8776.2

Pollutant: 2-butoxyethanol
TLV (ug/m3): 96,700
Maximum Hourly Emission Rate (lbs/hr): 4.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 504.8
MAGLC (ug/m3): 2302.4

Pollutant: Acrylic acid
TLV (ug/m3): 5,900
Maximum Hourly Emission Rate (lbs/hr): 0.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 53.7
MAGLC (ug/m3): 140.5

Pollutant: Toluene
TLV (ug/m3): 188,400
Maximum Hourly Emission Rate (lbs/hr): 31
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3329.4
MAGLC (ug/m3): 4485.7

Physical changes to or 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 Toxics 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 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

Miami Packaging, Inc.
PTI Application: 14-04057
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Facility ID: 1409010046

Emissions Unit ID: K003

exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with 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

Miami

PTI A

Emissions Unit ID: K003

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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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 14-04957 Facility ID: 1409010046

FACILITY NAME Miami Packaging, Inc.

FACILITY DESCRIPTION 8 Color Rotogravure Printing Press K003 - CITY/TWP Middletown
Modification from 7 color to 8 color

SIC CODE 2754 SCC CODE 4-05-005-01 EMISSIONS UNIT ID K003

EMISSIONS UNIT DESCRIPTION 8 Color Rotogravure Printing Press - Modification

DATE INSTALLED 1953

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	Attainment				
PM ₁₀	Attainment				
Sulfur Dioxide	Attainment				
Organic Compounds	Non-attainment	90.3 lbs/hr	54.2	90.3 lbs/hr	54.2
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? KK PSD? OFFSET POLICY?

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

BAT is demonstrated by VOC content limitations, use of a thermal oxidizer when using non-complying coatings and inks, compliance with emissions limitations and compliance with Air Toxics Policy.

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: see attached

NEW SOURCE REVIEW FORM B

PTI Number: 14-04957 Facility ID: 1409010046

FACILITY NAME Miami Packaging, Inc.

FACILITY DESCRIPTION 8 Color Rotogravure Printing Press K003 - CITY/TWP Middletown
Modification from 7 color to 8 color

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

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 type="checkbox"/>	0000000c.wpd	<input checked="" 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):

NEW SOURCE REVIEW FORM B

PTI Number: 14-04957 Facility ID: 1409010046

FACILITY NAME Miami Packaging, Inc.

FACILITY DESCRIPTION	8 Color Rotogravure Printing Press K003 - Modification from 7 color to 8 color	CITY/TWP	Middletown
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[NSR Discussion](#)
14-04957

Miami Packaging, Inc
1701 Reinartz Blvd.
Middletown, OH 45042

Facility ID: 1409010046

Miami Packaging, Inc. is a major source for VOC emissions. Miami Packaging, Inc. modified emissions unit K003 in 1992 by the addition of a eighth color station. A Permit to Install (PTI) was not processed at that time to address this modification. This agency may have advised the company in 1992 that a PTI was not needed but upon further review this agency has determined a PTI is needed. Ohio EPA has determined that the addition of the eighth color station resulted in an increase in the potential volatile organic compounds (VOC) emissions from this emissions unit and this meets the definition of "modification" in OAC rule 3745-31-01(VV). This PTI addresses the 1992 modification to emissions unit K003. The historic actual average emissions for emissions unit K003 for 1990 and 1991 was 29.3 TPY VOCs. The PTI request a VOC emissions limit of 54.2 TPY VOC, thereby resulting in an emissions increase of 24.9 TPY VOCs. Emissions unit K001 was modified in March 1993 to increase the VOC emissions from 24.80 TPY to 39.44 TPY thereby resulting in an emissions increase of 14.64 TPY. The modification to emissions unit K001 was contemporaneous with the modification to emissions unit K003. The net emissions increase resulting from these two modifications is $24.9 + 14.64 = 39.54$ TPY which is less than the threshold for major modification to a major source.

The applicable regulations are 40 CFR Part 63 Subpart KK, OAC rules 3745-31-05(A)(3) (BAT), 3745-31-05(D) (Synthetic Minor) and 3745-21-09(Y). The detailed emissions calculations are attached.

BAT is satisfied by VOC content limitations, use of a thermal oxidizer and compliance with emissions limitations and compliance with Air Toxics Policy

The emissions unit will be in compliance with all applicable regulations. A draft PTI should be issued for this emissions units.

Permit Fee:	<u>K003:</u>	<u>\$200</u>	(based on minimum PWR) Fee not doubled since modified prior to 1993.
	Total	\$200	

Prepared by: Ajay Bahri

NEW SOURCE REVIEW FORM B

PTI Number: 14-04957 Facility ID: 1409010046

FACILITY NAME Miami Packaging, Inc.

FACILITY DESCRIPTION	8 Color Rotogravure Printing Press K003 - Modification from 7 color to 8 color	CITY/TWP	Middletown
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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 **14-04957**

A. Source Description

This Permit to Install (PTI 14-04957) covers an 8 Color Rotogravure Printing Press (emissions unit K003). The PTI covers a 1992 modification to this emissions unit which included installation of the eighth color station. A PTI was not processed in 1992 for this modification.

B. Facility Emissions and Attainment Status

Miami Packaging, Inc is currently a major source for volatile organic compounds (VOC) emissions. The facility is located in Butler county which is a moderate non-attainment area for ozone.

C. Source Emissions

The historic average actual emissions for emissions unit K003 for the calendar years 1990 and 1991 were 29.3 TPY VOCs. The maximum uncontrolled emissions from K003 after the modification are 1068.7 TPY VOCs. The permittee has requested federally enforceable limitations in this PTI limiting the potential emissions from K003 to 54.2 TPY VOCs. This will result in an emissions increase of 24.9 TPY VOCs. Miami Packaging, Inc had a contemporaneous emissions increase of 14.64 TPY VOCs from emissions unit K001 (in March 1993). Thus, the net facility wide emissions increase at the time of modification was $24.9 \text{ TPY} + 14.64 = 39.54 \text{ TPY}$.

The VOC usage limitations outlined in this PTI will limit VOC emissions to 54.2 TPY as a rolling, 12-month summation. The permittee will maintain monthly records and submit quarterly reports as described in the PTI to ensure compliance with the usage and emission limits.

The PTI will also limit facility wide Hazardous Air Pollutants (HAPs) usage to 9.9 TPY as a rolling, 12-month summation for any single HAP and 24.9 TPY as a rolling, 12-month summation for all HAPs combined. Thus, the facility will be considered an area source according to 40 CFR Part 63 Subpart KK. The permittee will maintain monthly records and submit annual reports as described in the PTI to ensure compliance with the usage limits.

D. Conclusion

The terms and conditions in this PTI will limit the VOC emissions to 54.2 TPY. This will result in an emissions increase of 39.54 TPY VOCs (facility wide) at the time of modification. Thus, this constitutes a minor modification to a major facility and the emissions offsets policy does not apply.

The facility wide HAPs usage will also be limited to 9.9 TPY for any single HAP and 24.9 TPY for all HAPs combined. The facility will be considered an area source according to 40 CFR Part 63 Subpart KK and is only subject to the provisions of §63.829(d) and §63.830(b)(1) of 40 CFR Part 63 Subpart KK.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04957 Facility ID: 1409010046

FACILITY NAME Miami Packaging, Inc.

FACILITY DESCRIPTION 8 Color Rotogravure Printing Press K003 - CITY/TWP Middletown
Modification from 7 color to 8 color

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

NEW SOURCE REVIEW FORM B

PTI Number: 14-04957 Facility ID: 1409010046

FACILITY NAME Miami Packaging, Inc.

FACILITY DESCRIPTION 8 Color Rotogravure Printing Press K003 - CITY/TWP Middletown
Modification from 7 color to 8 color

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Tons Per Year

VOC

54.2