State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
BUTLER COUNTY
Application No: 14-04917
DATE: 11/16/2000

Intermec Technologies Corporation
Greg Tillery
9290 LeSaint Drive
Fairfield, OH 45014

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$600** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo

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

CC: **USEPA** **HCDES** **KY**
IN **OH-KY-IN Reg Coun of Gov**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: To be entered upon final issuance**
Terms and Conditions	**Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 14-04917

Application Number:	14-04917
APS Premise Number:	1409030853
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Intermec Technologies Corporation
Person to Contact:	Greg Tillery
Address:	9290 LeSaint Drive Fairfield, OH 45014

Location of proposed air contaminant source(s) [emissions unit(s)]:
9290 LeSaint Drive
Fairfield, **Ohio**

Description of proposed emissions unit(s):
Addition of (3) flexographic printing presses.

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. 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 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. 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.

9. 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.

10. 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.

11. 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).

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

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

applicable air pollution laws, 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 emissions unit(s) covered by this permit.

14. 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.

15. 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.

B. 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

Pollutant	Tons Per Year
VOC	47.0
Ammonia	0.54

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K014 - Flexographic printing press	OAC rule 3745-31-05(A)(3)	40.3 lbs. VOC/hr, excluding cleanup, 1.38 lbs. Ammonia/hr and 0.54 TPY Ammonia from emissions units K001 thru K006 and K008 thru K016 See terms A.2.d and B.1 thru B.3. The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-21-09 (Y)(1)	Exempt per OAC rule 3745-21-09 (Y)(2)(b)
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See term A.2.c

2. Additional Terms and Conditions

2.a The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage and

VOC content limits and compliance with the Air Toxics Policy.

2.c The combined volatile organic compound (VOC) emissions from emissions units K001 thru K006 and K008 thru K016 shall not exceed 47.0 tons per year, based on a rolling, 12-month summation.

2.d The following VOC content limitations shall apply to all materials employed in emissions units K001 thru K006 and K008 thru K016:

i. The VOC content of each solvent based ink shall not exceed 8.0 pounds per gallon, as applied.

ii. The VOC content of each water based ink shall not exceed 1.0 pound per gallon, as applied.

iii. The VOC content of each liquid organic cleanup material employed shall not exceed 8.0 pounds per gallon.

B. Operational Restrictions

1. The maximum annual solvent based ink usage in emissions units K001 thru K006 and K008 thru K016 combined shall not exceed 5,000 gallons per year based upon a rolling, 12-month summation of the solvent based ink usage figures. The permittee has existing records to demonstrate compliance with the usage limit upon issuance of this permit.

2. The maximum annual water based ink usage in emissions units K001 thru K006 and K008 thru K016 combined shall not exceed 6,000 gallons per year based upon a rolling, 12-month summation of the water based ink usage figures.

3. The maximum annual liquid organic cleanup material usage in emissions units K001 thru K006 and K008 thru K016 combined shall not exceed 6,000 gallons per year based upon a rolling, 12-month summation of the liquid organic cleanup material usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records which list the following information for each coating and cleanup material employed in emissions units K001-K006 and K008-K016:

a. the company identification of each ink and cleanup material;
b. the number of gallons of each solvent based ink employed;

c. the number of gallons of each water based ink employed;
d. the number of gallons of each cleanup material employed;
e. the VOC content of each ink and cleanup material, as applied including water;
f. the total pounds of solvent based inks and water based inks, employed.;
g. the rolling, 12-month summation of the solvent based ink usage;
h. the rolling, 12-month summation of the water based ink usage;
i. the rolling, 12-month summation of the liquid organic cleanup material usage;

2. The permit to install for emissions unit K014 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: Ammonia
TLV (ug/m3): 17,410
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 243.7
MAGLC (ug/m3): 415

Pollutant: n-propyl alcohol
TLV (ug/m3): 491,500
Maximum Hourly Emission Rate (lbs/hr): 6.55
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,064
MAGLC (ug/m3): 11,702

Physical changes to or in the method of operation of the emissions unit after it's 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 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

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.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing an exceedance of the ink and/or liquid organic cleanup material VOC content limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

2. The permittee shall submit semi-annual reports which identify the updated rolling, 12-month material usage for solvent based inks, water based inks and liquid organic cleanup materials for each month.
These reports shall be submitted February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June).

3. The permittee shall submit annual reports which specify the total VOC emissions from emissions units K001-K006 and K008-K016 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings and cleanup materials employed in this emissions unit. 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. Compliance with the usage limits in term B.1, B.2 and B.3 shall be determined by the record keeping in term C.1.

F. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall modify the air pollution control requirements for the emissions units K001 thru K006 and K008 thru K013 contained in permit to install 14-4094 issued on December 8, 1999.

2. The following terms and conditions of this permit are federally enforceable: A., B.1, B.2, B.3, C.1, D.1, D.2, E.1 and E.2.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K015 - Flexographic printing press	OAC rule 3745-31-05(A)(3)	40.3 lbs. VOC/hr, excluding cleanup, 1.38 lbs. Ammonia/hr and 0.54 TPY Ammonia from emissions units K001 thru K006 and K008 thru K016 See terms A.2.d and B.1 thru B.3. The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-21-09 (Y)(1)	Exempt per OAC rule 3745-21-09 (Y)(2)(b)
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See term A.2.c

2. Additional Terms and Conditions

2.a The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage and

VOC content limits and compliance with the Air Toxics Policy.

2.c The combined volatile organic compound (VOC) emissions from emissions units K001 thru K006 and K008 thru K016 shall not exceed 47.0 tons per year, based on a rolling, 12-month summation.

2.d The following VOC content limitations shall apply to all materials employed in emissions units K001 thru K006 and K008 thru K016:

i. The VOC content of each solvent based ink shall not exceed 8.0 pounds per gallon, as applied.

ii. The VOC content of each water based ink shall not exceed 1.0 pound per gallon, as applied.

iii. The VOC content of each liquid organic cleanup material employed shall not exceed 8.0 pounds per gallon.

B. Operational Restrictions

1. The maximum annual solvent based ink usage in emissions units K001 thru K006 and K008 thru K016 combined shall not exceed 5,000 gallons per year based upon a rolling, 12-month summation of the solvent based ink usage figures. The permittee has existing records to demonstrate compliance with the usage limit upon issuance of this permit.

2. The maximum annual water based ink usage in emissions units K001 thru K006 and K008 thru K016 combined shall not exceed 6,000 gallons per year based upon a rolling, 12-month summation of the water based ink usage figures.

3. The maximum annual liquid organic cleanup material usage in emissions units K001 thru K006 and K008 thru K016 combined shall not exceed 6,000 gallons per year based upon a rolling, 12-month summation of the liquid organic cleanup material usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records which list the following information for each coating and cleanup material employed in emissions units K001-K006 and K008-K016:

a. the company identification of each ink and cleanup material;
b. the number of gallons of each solvent based ink employed;

c. the number of gallons of each water based ink employed;
d. the number of gallons of each cleanup material employed;
e. the VOC content of each ink and cleanup material, as applied including water;
f. the total pounds of solvent based inks and water based inks, employed;
g. the rolling, 12-month summation of the solvent based ink usage;
h. the rolling, 12-month summation of the water based ink usage;
i. the rolling, 12-month summation of the liquid organic cleanup material usage;

2. The permit to install for emissions unit K015 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: Ammonia
TLV (ug/m3): 17,410
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 243.7
MAGLC (ug/m3): 415

Pollutant: n-propyl alcohol
TLV (ug/m3): 491,500
Maximum Hourly Emission Rate (lbs/hr): 6.55
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,064
MAGLC (ug/m3): 11,702

Physical changes to or in the method of operation of the emissions unit after it's 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 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

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.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing an exceedance of the ink and/or liquid organic cleanup material VOC content limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

2. The permittee shall submit semi-annual reports which identify the updated rolling, 12-month material usage for solvent based inks, water based inks and liquid organic cleanup materials for each month.
These reports shall be submitted February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June).

3. The permittee shall submit annual reports which specify the total VOC emissions from emissions units K001-K006 and K008-K016 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings and cleanup materials employed in this emissions unit. 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. Compliance with the usage limits in term B.1, B.2 and B.3 shall be determined by the record keeping in term C.1.

F. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall modify the air pollution control requirements for the emissions units K001 thru K006 and K008 thru K013 contained in permit to install 14-4094 issued on December 8, 1999.

2. The following terms and conditions of this permit are federally enforceable: A., B.1, B.2, B.3, C.1, D.1, D.2, E.1 and E.2.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K016 - Flexographic printing press	OAC rule 3745-31-05(A)(3)	40.3 lbs. VOC/hr, excluding cleanup, 1.38 lbs. Ammonia/hr and 0.54 TPY Ammonia from emissions units K001 thru K006 and K008 thru K016 See terms A.2.d and B.1 thru B.3. The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-21-09 (Y)(1)	Exempt per OAC rule 3745-21-09 (Y)(2)(b)
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See term A.2.c

2. Additional Terms and Conditions

2.a The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage and

VOC content limits and compliance with the Air Toxics Policy.

2.c The combined volatile organic compound (VOC) emissions from emissions units K001 thru K006 and K008 thru K016 shall not exceed 47.0 tons per year, based on a rolling, 12-month summation.

2.d The following VOC content limitations shall apply to all materials employed in emissions units K001 thru K006 and K008 thru K016:

i. The VOC content of each solvent based ink shall not exceed 8.0 pounds per gallon, as applied.

ii. The VOC content of each water based ink shall not exceed 1.0 pound per gallon, as applied.

iii. The VOC content of each liquid organic cleanup material employed shall not exceed 8.0 pounds per gallon.

B. Operational Restrictions

1. The maximum annual solvent based ink usage in emissions units K001 thru K006 and K008 thru K016 combined shall not exceed 5,000 gallons per year based upon a rolling, 12-month summation of the solvent based ink usage figures. The permittee has existing records to demonstrate compliance with the usage limit upon issuance of this permit.

2. The maximum annual water based ink usage in emissions units K001 thru K006 and K008 thru K016 combined shall not exceed 6,000 gallons per year based upon a rolling, 12-month summation of the water based ink usage figures.

3. The maximum annual liquid organic cleanup material usage in emissions units K001 thru K006 and K008 thru K016 combined shall not exceed 6,000 gallons per year based upon a rolling, 12-month summation of the liquid organic cleanup material usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records which list the following information for each coating and cleanup material employed in emissions units K001-K006 and K008-K016:

a. the company identification of each ink and cleanup material;
b. the number of gallons of each solvent based ink employed;
c. the number of gallons of each water based ink employed;

d. the number of gallons of each cleanup material employed;
e. the VOC content of each ink and cleanup material, as applied including water;
f. the total pounds of solvent based inks and water based inks, employed;
g. the rolling, 12-month summation of the solvent based ink usage;
h. the rolling, 12-month summation of the water based ink usage;
i. the rolling, 12-month summation of the liquid organic cleanup material usage;

2. The permit to install for emissions unit K016 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: Ammonia
TLV (ug/m3): 17,410
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 243.7
MAGLC (ug/m3): 415

Pollutant: n-propyl alcohol
TLV (ug/m3): 491,500
Maximum Hourly Emission Rate (lbs/hr): 6.55
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,064
MAGLC (ug/m3): 11,702

Physical changes to or in the method of operation of the emissions unit after it's 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 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 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.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing an exceedance of the ink and/or liquid organic cleanup material VOC content limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

2. The permittee shall submit semi-annual reports which identify the updated rolling, 12-month material usage for solvent based inks, water based inks and liquid organic cleanup materials for each month.
These reports shall be submitted February 15 and August 15 of each year and shall cover the

previous six calendar months (July through December and January through June).

3. The permittee shall submit annual reports which specify the total VOC emissions from emissions units K001-K006 and K008-K016 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings and cleanup materials employed in this emissions unit. 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. Compliance with the usage limits in term B.1, B.2 and B.3 shall be determined by the record keeping in term C.1.

F. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall modify the air pollution control requirements for the emissions units K001 thru K006 and K008 thru K013 contained in permit to install 14-4094 issued on December 8, 1999.

2. The following terms and conditions of this permit are federally enforceable: A., B.1, B.2, B.3, C.1, D.1, D.2, E.1 and E.2.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04917 Facility ID: 1409030853

FACILITY NAME Intermec Technologies Corporation

FACILITY DESCRIPTION Addition of (3) flexographic printing presses CITY/TWP Fairfield

SIC CODE 2672 SCC CODE 4-05-003-01 EMISSIONS UNIT ID K014

EMISSIONS UNIT DESCRIPTION Flexographic printing press

DATE INSTALLED 11/2000

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_{10}					
Sulfur Dioxide					
Organic Compounds	Nonattainment	40.3 lbs./ hr.	47.0	40.3 lbs./hr.	47.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Ammonia	unclassified	1.38 lbs./hr.	0.54	1.38 lbs./hr.	0.54

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Best available technology is satisfied by the usage and VOC content limits and compliance with the 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 ____ NO

IDENTIFY THE AIR CONTAMINANTS: Ammonia / N-propyl alcohol

NEW SOURCE REVIEW FORM B

PTI Number: 14-04917 Facility ID: 1409030853

FACILITY NAME Intermec Technologies Corporation

FACILITY DESCRIPTION Addition of (3) flexographic printing CITY/TWP Fairfield

Emissions Unit ID: **K016**

SIC CODE 2672 SCC CODE 4-05-003-01 EMISSIONS UNIT ID K015

EMISSIONS UNIT DESCRIPTION Flexographic printing press

DATE INSTALLED 11/2000

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_{10}					
Sulfur Dioxide					
Organic Compounds	Nonattainment	40.3 lbs./ hr.	47.0	40.3 lbs./hr.	47.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	unclassified	1.38 lbs./hr.	0.54	1.38 lbs./hr.	0.54

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Best available technology is satisfied by the usage and VOC content limits and compliance with the 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 ____ NO

IDENTIFY THE AIR CONTAMINANTS: Ammonia / N-propyl alcohol

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NEW SOURCE REVIEW FORM B

PTI Number: 14-04917 Facility ID: 1409030853

FACILITY NAME Intermec Technologies Corporation

FACILITY DESCRIPTION Addition of (3) flexographic printing CITY/TWP Fairfield

Emissions Unit ID: **K016**

SIC CODE 2672 SCC CODE 4-05-003-01 EMISSIONS UNIT ID K016

EMISSIONS UNIT DESCRIPTION Flexographic printing press

DATE INSTALLED 11/2000

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_{10}					
Sulfur Dioxide					
Organic Compounds	Nonattainment	40.3 lbs./ hr.	47.0	40.3 lbs./hr.	47.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	unclassified	1.38 lbs./hr.	0.54	1.38 lbs./hr.	0.54

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Best available technology is satisfied by the usage and VOC content limits and compliance with the 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 ____ NO

IDENTIFY THE AIR CONTAMINANTS: Ammonia / N-propyl alcohol