



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Butler County
Application No: 14-4199
NESHAP
TOXIC REVIEW

CERTIFIED MAIL

October 22, 1997

TREY CORRUGATED & STERLING COATINGS
CHRIS MILLER
9048 PORT UNION-RIALTO ROAD
WEST CHESTER, OH 45069

RECEIVED

OCT 30 1997

Hamilton County Department
of Environmental Services

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 with the Environmental Review Appeals Commission within thirty (30) days after 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, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
CINCINNATI AIR POLLUTION, DAPC

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 14-4199
APS Premise No. 1409000859
Permit Fee: \$1400.00

Name of Facility: TREY CORRUGATED & STERLING COATINGS

Person to Contact: CHRIS MILLER

Address: 9048 PORT UNION-RIALTO ROAD
WEST CHESTER, OH 45069

Location of proposed source(s): 9048 PORT UNION-RIALTO ROAD
WEST CHESTER, OHIO

Description of proposed source(s):
THREE PAPER ROLL STOCK COATERS AND ONE FLEXOGRAPHIC PRINTING
PRESS.

Date of Issuance: October 22, 1997

Effective Date: October 22, 1997

The above named entity is hereby granted a permit to install for the above described source(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 source(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 source(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

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 source(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 Ohio Administrative Code (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)

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may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for TREY CORRUGATED & STERLING COATINGS located in Butler County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K001	Paper roll stock coater line no. 1	Coating usage, VOC content, and emission limitations	3745-31-05 3745-15-07 3745-21-09 (F)	24.75 lbs/hr and 16.44 TPY of VOC from K001, K002 and K003; and 2.25 lbs/hr and 9.0 TPY NH3 from K001-K003.
K002	Paper roll stock coater line no. 2	Coating usage, VOC content, and emission limitations	3745-31-05 3745-15-07 3745-21-09 (F)	24.75 lbs/hr and 16.44 TPY of VOC from K001, K002 and K003; and 2.25 lbs/hr and 9.0 TPY NH3 from K001-K003.
K003	Paper roll stock coater line no. 3	Coating usage, VOC content, and emission limitations	3745-31-05 3745-15-07 3745-21-09 (F)	24.75 lbs/hr and 16.44 TPY of VOC from K001, K002 and K003; and 2.25 lbs/hr and 9.0 TPY NH3 from K001-K003.
K004	Flexographic printing press	Coating usage, VOC content, and emission limitations	3745-31-05 3745-15-07 3745-21-09 (Y) (1) (a) 40 CFR 63, Subpart KK	1.67 lbs/hr and 5.58 TPY of VOC, and 0.2 lb/hr and 0.63 TPY of NH3

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	22.02
Ammonia (NH3)	9.63

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, Ohio 45210.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, Ohio 45210.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

- A. The combined, maximum total amount of coatings employed in emissions units K001, K002 and K003 shall not exceed 360,000 gallons per year (including water).
- B. The VOC content of the coatings employed in emissions units K001, K002 and K003 shall not exceed 0.09 pound/gallon, as applied, (including water) based on a monthly volume-weighted average. The maximum VOC content of any coating employed in emissions units K001, K002 and K003 shall not exceed 0.55 pound/gallon, as applied, (including water).
- C. The VOC content of any coating employed in emissions unit K001, K002 and K003 shall not exceed 2.9 pounds/gallon, as applied (excluding water and exempt solvents).
- D. The VOC content of any coating employed in emissions unit K004 shall not exceed 0.44 pound/gallon, as applied (including water).
- E. The VOC content of any coating employed in emissions unit K004 shall not exceed forty percent VOC by volume of the coating and ink, as applied, (excluding water) or twenty-five percent VOC by volume of the volatile matter in the coating and ink.
- F. The total amount of coatings employed in emissions units K004 shall not exceed 25,000 gallons per year (including water).
- G. The amount of organic cleanup materials employed at emissions units K001 through K004 shall not exceed 200 gallons per year, per emissions unit.
- H. The VOC content of the cleanup materials employed at emissions units K001 through K004 shall not exceed 0.78 pound/gallon.
- I. The permittee shall collect and record the following information each month for emissions units K001, K002 and K003:
 - 1. the name and identification number of each coating and cleanup material employed;

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2. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied, in pounds VOC/gallon;
3. the mass of VOC per volume of each coating (including water and exempt solvents), as applied, in pounds VOC/gallon;
4. the amount of each coating employed, in gallons;
5. the amount of cleanup material employed, in gallons;
6. the VOC content of each cleanup material employed, in pounds VOC/gallon;
7. the monthly volume-weighted average VOC content of all coatings employed during the calendar month, in pounds VOC/gallon, as applied (including water and exempt solvents); and,
8. the total mass VOC emission rate from all coatings and cleanup materials employed, in pounds or tons.

These monthly records shall be maintained in the permittee's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

- J. The permittee shall collect and record the following information each month for emissions unit K004:
1. the name and identification number of each coating and cleanup material employed;
 2. the mass of VOC per volume of each coating (including water), as applied, in pounds VOC/gallon;
 3. the VOC content of each coating employed, in percent VOC by volume of the coating, as applied (excluding water);
 4. the amount of each coating employed, in gallons;
 5. the amount of cleanup material employed, in gallons;
 6. the VOC content of each cleanup material employed, in pounds VOC/gallon; and,
 7. the total mass VOC emission rate from all coatings and cleanup materials employed, in pounds or tons.

These monthly records shall be maintained in the permittee's files for a period of not less than five years and shall be

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made available to the Director or any authorized representative of the Director for review during normal business hours.

- K. The permittee shall notify the Director (the Hamilton County Dept. of Env. Services) of any monthly record showing the use of noncompliance coatings or cleanup materials (i.e., coatings or cleanup materials exceeding the allowable VOC content) or showing an exceedance of the coating or cleanup material usage limitations set forth in this Permit to Install. A copy of such record shall be sent to the Director (the Hamilton County Dept. of Env. Services) within thirty days following the end of the calendar month.
- L. U.S. EPA 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 U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
- M. The permittee shall submit an initial notification for this emissions unit in accordance with 40 CFR 63.830(b)(1).
- N. The potential emissions [as defined by OAC 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs.

The permittee shall collect and record the following information each month for the entire facility:

1. the name and identification number of each coating, as applied;
2. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
3. the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (2));
4. the number of gallons of each coating employed;
5. the name and identification of each cleanup material employed;

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6. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
7. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (6));
8. the number of gallons of each cleanup material employed;
9. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP the sum of (2) times (4) for each coating and the sum of (6) times (8) for each cleanup material); and,
10. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (3) times (4) for each coating plus the sum of (7) times (8) for each cleanup material).

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 Dept. of Env. Services contact. This information does not have to be kept on a line-by-line basis.

- O. The permittee shall notify the Director (the Hamilton County Dept. of Env. Services) of any exceedance of the HAP emissions limitations set forth in this Permit to Install.
- P. The permittee shall submit required reports in the following manner:
 1. reports of any required monitoring and/or recordkeeping information shall be submitted to the Hamilton County Dept. of Env. Services;
 2. 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 Hamilton County Dept. of Env. Services. 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

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previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

- Q. The permittee shall submit annual reports which specify the total VOC emissions from emissions units K001-K003, and emissions unit K004 for the previous calendar year. These reports shall be submitted by January 31 of each year.