



State of Ohio Environmental Protection Agency

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

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-04840

DATE: 6/14/00

Wood Graphics Inc
Mike Elliott
9126 Industrial Blvd
Covington, GA 30014

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 Directors 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 and Permit Section
Division of Air Pollution Control

cc: USEPA

HCDES



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 6/14/00

FINAL PERMIT TO INSTALL 14-04840

Application Number: 14-04840
APS Premise Number: 1431153902
Permit Fee: **\$400**
Name of Facility: Wood Graphics Inc
Person to Contact: Mike Elliott
Address: 9126 Industrial Blvd
Covington, GA 30014

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

**1270 Hillsmith Drive
Cincinnati, Ohio**

Description of proposed emissions unit(s):

Solvent Cleaning Operation (Embossing Room).

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

Wood Graphics Inc
PTI Application: 14-04840
Issued: 6/14/00

Facility ID: 1431153902

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	2.06

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Solvent Cleaning Operation (Embossing Room)	OAC rule 3745-31-05(A)(3)	2.06 TPY OC
		See Sections A.2.2.a. and B.2.
	OAC rule 3745-21-07(G)(2)	8 lbs/hr OC 40 lbs/day OC

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage restrictions and emission limitations.

B. Operational Restrictions

- 1. The permittee shall maintain tightly fitting caps and/or lids on the solvent cleaning containers, at all times, except when loading or unloading the solvent.
- 2. The maximum annual solvent cleaning material usage (after accounting for solvent recovery) for this emissions unit shall not exceed 4,110 pounds.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information after each batch for this emissions unit:
 - a. The company identification for each solvent cleaning material employed.

- b. The number of pounds of each solvent cleaning material employed.
- c. The number of pounds of each solvent cleaning material recovered for reuse.
- d. The number of pounds of each solvent cleaning material emitted (b-c).
- e. The number of hours of operation for each batch.
- f. The total organic compound (OC) emission rate in pounds per hour (d/e).
- g. The total organic compound (OC) emission rate in pounds per day, calculated by summing the OC emissions from each batch for the day.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each hour during which the organic compound emissions from the solvent cleaning material exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
 - b. An identification of each day during which the organic compound emissions from the solvent cleaning material exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year, as well as any exceedances of the annual solvent cleaning material usage limitation. These reports shall be submitted by January 31 of each year.
3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8 lbs/hr OC

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- b. Emission Limitation:
40 lbs/day OC

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in Section C.1.

- c. Emission Limitation:
2.06 TPY OC

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in Section C.1., and shall be the sum of the daily OC emission rates for the calendar year.

- d. Usage Limitation:
4,110 pounds/year of solvent cleaning materials (after accounting for solvent recovery)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in Section C.1.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04840 Facility ID: 1431153902

FACILITY NAME Wood Graphics Inc

FACILITY DESCRIPTION Solvent Cleaning Operation (Embossing Room). CITY/TWP Cincinnati

SIC CODE 3471 SCC CODE 3-09-011-04 EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION Solvent Cleaning Operation (Embossing Room)

DATE INSTALLED 6/97

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	1.03 lbs/hr	0.62 TPY	8 lbs/hr	2.06 TPY
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No

NESHAP? No

PSD? No

OFFSET POLICY? No

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

BAT has been determined to be compliance with all applicable rules, emission limitations and usage restrictions.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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*?

YES

X

NO

IDENTIFY THE AIR CONTAMINANTS:

NA

NEW SOURCE REVIEW FORM B

PTI Number: 14-04840 Facility ID: 1431153902

FACILITY NAME Wood Graphics Inc

FACILITY DESCRIPTION	Solvent Cleaning Operation (Embossing Room).	CITY/TWP	Cincinnati
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Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

NONE

Please provide any additional permit specific notes as you deem necessary:

Wood Graphics Inc.
1270 Hillsmith Dr.
Cincinnati, OH 45215
PN: 1431153902

PERMIT REVIEW NARRATIVE

PTI 14-04840

Wood Graphics cleans and chrome plates copper and steel cylinders that are used in the printing industry. This PTI is for a solvent cleaning operation (the embossing room) and is assigned emissions unit number P003.

The OAC rules governing emissions unit P003 are 3745-31-05(A)(3) and 3745-21-07(G)(2). Usage limitations are set at 4,110 pounds/year (based on actual 1999 usage of 2,055 pounds doubled to give room for growth) of solvent cleaning materials, after accounting for solvent recovery. Therefore, the annual emission limitation is set at 2.06 TPY OC (the solvent cleaning materials are 100% volatile). The limit of 2.06 TPY OC was set in order to avoid air toxics modeling for this emissions unit. Based on OAC rule 3745-21-07(G)(2), the short term emission limitations will be 8 lbs/hr OC and 40 lbs/day OC. The actual emissions from this source are less than these limits, but in case of a production spike, this will allow Wood Graphics the desired flexibility to continue operations. The Potential to Emit (PTE) from the operation is 7.3 TPY OC.

The solvent cleaning material currently employed is Pro-Tek S-18, which is composed of methylene chloride, perchloroethylene and toluene. Based on an inspection of this emissions unit, it was determined that this is a hand wipe operation, and there is no standing solvent in the tank, so this operation is exempt from 40 CFR Part 63 Subpart T.

Batch record keeping will demonstrate compliance with all limitations, as will exceedance and annual reports. Since the PTE is 7.3 TPY OC, this permit will be issued in final. Federally enforceable limits are not needed. Potential HAPs from this facility are well under the limits of 10 TPY for any single HAP and 25 TPY for total HAPs.

Since all air toxics are emitted in quantities of less than 1 TPY, this emissions unit is not subject to the air toxics policy. BAT for emissions unit P003 is compliance with the applicable rules, emission limitations, OC content limitations and usage restrictions.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04840 Facility ID: 1431153902

FACILITY NAME Wood Graphics Inc

FACILITY DESCRIPTION	Solvent Cleaning Operation (Embossing Room).	CITY/TWP	Cincinnati
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The permit fee is:

\$400 [Process between 1 and 1,000 lbs/hr (P003) - doubled, equipment installed in 6/97]

Prepared by: Kari Ball

Date prepared: May 3, 2000

Permit To Install Synthetic Minor Write-Up

NONE

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	2.06