

Synthetic Minor Determination and/or  Netting Determination

Permit To Install 14-05532

**A. Source Description**

KDM Signs, Inc. operates screen and lithographic printing presses for the production of outdoor signs and banners. Other emission units include a screen reclamation process, and ink room cleanup emissions. The emissions units included on this proposed permit are a screen reclamation process, ink room cleanup, screen printing presses for UV inks (inline presses 1 and 2) and a previously permitted emission unit, R002, the Viking Screen printing press with dryer, which can use UV or conventional solvent based inks. Other emission sources located at the facility include the Kamori 640 printing press, the Kamori 526 printing press, and ten smaller UV ink screen printing stations which have potential emissions of less than 3 tons per year, and are thus exempt from permit requirements per OAC 3745-31-03.

**B. Facility Emissions and Attainment Status**

KDM Signs is located in Hamilton County. Hamilton County is in attainment for all criteria pollutants except ozone. KDM signs has potential OC emissions greater than 100 TPY . KDM Signs has potential combined facility wide HAP emissions of greater than 25 tons per year. The facility has actual OC emissions of approximately 12 tons per year.

**C. Source Emissions**

The emissions units included on this proposed permit have potential individual HAP emissions of 17.04 tons per year, and potential OC emissions of 30.88 tons per year. The potential OC emissions for emissions unit R002 are 54.75 TPY. The coating and cleanup material usage will be limited to limit the OC emissions to 8.05 TPY.

**D. Conclusion**

The proposed permit to install seeks to impose Federally enforceable limits on HAP emissions from this facility to avoid case-by case MACT and Title V and the OC emissions from emissions unit R002. The terms and conditions proposed in this permit are sufficient to document compliance with the proposed HAP and OC emission limitations. The permittee will maintain monthly records and submit quarterly reports. Therefore, approval of a synthetic minor permit for KDM Signs is recommended.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
HAMILTON COUNTY  
Application No: 14-05532**

**CERTIFIED MAIL**

**DATE: 5/4/2004**

KDM Signs Inc  
Douglas Pulvere  
10450 N Medallion Drive  
Cincinnati, OH 45241-3199

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 or 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 **\$1800** 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,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

HCDES

OH-KY-IN Regional Council of Gov.

KY

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**HAMILTON COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05532 FOR AN AIR CONTAMINANT SOURCE FOR  
KDM SIGNS INC**

On 5/4/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **KDM Signs Inc**, located at **10450 N Medallion Drive, Cincinnati**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05532:

**PTI application for previously unpermitted sources, modification of R002, request for facility wide synthetic minor HAP status.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howard Taft Pkwy,  
Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 14-05532**

Application Number: 14-05532  
APS Premise Number: 1431153991  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: KDM Signs Inc  
Person to Contact: Douglas Pulvere  
Address: 10450 N Medallion Drive  
Cincinnati, OH 45241-3199

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

**10450 N Medallion Drive  
Cincinnati, Ohio**

Description of proposed emissions unit(s):

**PTI application for previously unpermitted sources, modification of R002, request for facility wide synthetic minor HAP status.**

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

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Director

**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**

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

**KDM Signs Inc**

**Facility ID: 1431153991**

**PTI Application: 14-05532**

**Issued: To be entered upon final issuance**

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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**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**

- 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 ninety (90) days after commencing operation of the source(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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	43.32

**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>
P001 - Ink room cleanup	OAC rule 3745-31-05(A)(3)	0.44 lb/hr of organic compound (OC) emissions  1.95 TPY of OC emissions  See terms A.2.b, B.1, B.2, and B.3  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	See term A.2.c
	OAC rule 3745-21-07(G)	Exempt. (See term B.1)

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with all applicable regulations, use of nonphotochemically reactive materials, emission limitations, and OC content and usage limitations.
- 2.b The OC content of cleanup materials shall not exceed 6.75 pounds per gallon, unless the vapor pressure of the cleanup material is less than 10 mm Hg at standard temperature and pressure. The OC content of cleanup materials having vapor pressure less than 10 mmHg shall not exceed 13.50 pounds per gallon.

**KDM**

**PTI A**

Emissions Unit ID: **P001**

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- 2.c** The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Ink room cleanup), P002 (Screen Reclamation process), R002 (Viking screen printing dryer), R004 (Inline 1 - five unit screen printing press for UV inks), R005 (Inline 2 - four unit screen printing press for UV inks), the Kamori 640 printing press, the Kamori 526 printing press, and screen printing operations and associated clean up operations identified as LSP1, LSP2, LSP3, P1, P2, P3, E1, E2, S1, and S2 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.

- 2.d** The hourly emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

## **B. Operational Restrictions**

1. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.
2. The total amount of cleanup material employed in this emissions unit shall not exceed 275 gallons per year.
3. All used, solvent soaked rags from the clean-up of this emissions unit shall be stored in containers with tightly fitting lids.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each month:
  - a. The company identification for each cleanup material (liquid organic material) employed and documentation indicating whether or not the liquid organic material is photochemically reactive as defined by OAC 3745-21-01(C)(5).
  - b. The number of gallons of each cleanup material employed.
  - c. The organic compound content of each cleanup material, in pounds per gallon.

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- d. The vapor pressure of the cleanup material in mmHg.
  - e. The total organic compound emission rate for all cleanup materials, in pounds per month ( $b \times c$ , or if the vapor pressure  $< 10$  mmHg,  $(b \times c) / 2$ ).
2. The permittee shall collect and record the following information each month for each emissions unit or process identified in term A.2.c of this permit:
- a. The name and identification number of each coating employed.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. 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 (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
  - g. 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 (f)].
  - h. The number of gallons of each cleanup material employed.
  - i. 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 (b) times (d) for each coating plus the sum of (f) times (h) times (1 - the solvent recovery rate) for each cleanup material].
  - j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coatings plus the sum of (g) times (h) times (1 - the solvent recovery rate) for each cleanup material];
  - k. The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven

calendar months; and

1. The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* 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.

#### **D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying cleanup solvents (i.e., for OC contents). 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 following the end of the calendar month.
3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.c. If no exceedances occurred, the permittee shall state so in the report.
4. The permittee shall submit annual reports that specify the total amount of cleanup material employed during the previous calendar year. These reports shall be submitted by January 31 of each year.
5. 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. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the OC contents of the cleanup materials.

**KDM**

**PTI A**

Emissions Unit ID: **P001**

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2. Compliance with the OC emission limitations specified in term A.1. shall be demonstrated by the record keeping requirements as specified in term C.1.
3. Compliance with the usage limitations specified in term B.2. shall be demonstrated by the record keeping requirements as specified in term C.1.
4. Compliance with the HAP emissions limitation in term A.2.c shall be demonstrated by the recordkeeping in term C.2

**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

**KDM Signs Inc**  
**PTI A**  
**Issued**

**Facility ID: 1431153991**

Emissions Unit ID: **P001**

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.

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

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**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>
P002 - Screen Reclamation process	OAC rule 3745-31-05(A)(3)	2.77 lbs/hr of organic compound (OC) emissions  12.16 TPY of OC emissions  See terms A.2.b, B.1, and B.2  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	See term A.2.c
	OAC rule 3745-21-07(G)	Exempt. (See term B.1.)

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with all applicable regulations, use of nonphotochemically reactive materials, emission limitations, and OC content and usage limitations.
- 2.b The OC content of the screen reclamation solvent shall not exceed 6.08 pounds per gallon.
- 2.c The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Ink room cleanup),

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P002 (Screen Reclamation process), R002 (Viking screen printing dryer), R004 ( Inline 1 - five unit screen printing press for UV inks), R005 (Inline 2 - four unit screen printing press for UV inks), the Kamori 640 printing press, the Kamori 526 printing press, and screen printing operations and associated clean up operations identified as LSP1, LSP2, LSP3, P1, P2, P3, E1, E2, S1, and S2 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.

- 2.d** The hourly emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

**B. Operational Restrictions**

1. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.
2. The total amount of screen reclamation solvent employed in this emissions unit shall not exceed 4000 gallons per year.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each month:
  - a. The company identification for each screen reclamation solvent employed and documentation indicating whether or not the liquid organic material is photochemically reactive as defined by OAC rule 3745-21-01(C)(5).
  - b. The number of gallons of screen reclamation solvent employed.
  - c. The organic compound content of each screen reclamation solvent, in pounds per gallon.
  - d. The total organic compound emission rate for all screen reclamation solvents, in pounds per month ( b x c).

[Note: The information must be for the screen reclamation solvent as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following information each month for each emissions unit or process identified in term A.2.c of this permit:
  - a. The name and identification number of each coating employed.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. 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 (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
  - g. 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 (f)].
  - h. The number of gallons of each cleanup material employed.
  - i. 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 (b) times (d) for each coating plus the sum of (f) times (h) times (1 - the solvent recovery rate) for each cleanup material].
  - j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coatings plus the sum of (g) times (h) times (1 - the solvent recovery rate) for each cleanup material];
  - k. The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
  - l. The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

**KDM  
PTI A**

Emissions Unit ID: **P002**

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\* 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.

**D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying screen reclamation solvents sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.c. If no exceedances occurred, the permittee shall state so in the report.
4. The permittee shall submit annual reports that specify the total amount of screen reclamation solvent employed during the previous calendar year. These reports shall be submitted by January 31 of each year.
5. 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. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the OC contents of the screen reclamation solvent.
2. Compliance with the OC emission limitations specified in term A.1. shall be based upon the record keeping requirements as specified in term C.1.
3. Compliance with the usage limitations specified in term B.2. shall be based upon the record keeping requirements as specified in term C.1.

4. Compliance with the HAP emissions limitation in term A.2.c shall be demonstrated by the record keeping in term C.2.

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

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**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>
R002 - Viking screen printing dryer	OAC rule 3745-31-05(A)(3)	12.5 lbs/hr of organic compound (OC) emissions from coatings only.  See terms A.2.b, A.2.c, B.1, and B.4.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	8.05 TPY of OC emissions, including cleanup, based upon a rolling, 12-month summation from coatings and cleanup materials.  See terms A.2.d, B.2, and B.3
	OAC rule 3745-21-07(G)	Exempt. (See term B.1.)

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with all applicable regulations, use of non-photochemically reactive materials, emission limitations,

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and OC content and usage limitations.

- 2.b** The OC content (as applied) of each coating shall not exceed 6.24 pounds per gallon of coating.
- 2.c** The OC content of cleanup materials shall not exceed 6.75 pounds per gallon, unless the vapor pressure of the cleanup material is less than 10 mm Hg at standard temperature and pressure. The OC content of cleanup materials having vapor pressure less than 10 mmHg shall not exceed 13.50 pounds per gallon.
- 2.d** The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Ink room cleanup), P002 (Screen Reclamation process), R002 (Viking screen printing dryer), R004 (Inline 1 - five unit screen printing press for UV inks), R005 (Inline 2 - four unit screen printing press for UV inks), the Kamori 640 printing press, the Kamori 526 printing press, and screen printing operations and associated clean up operations identified as LSP1, LSP2, LSP3, P1, P2, P3, E1, E2, S1, and S2 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.

- 2.e** The hourly emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

**B. Operational Restrictions**

- 1. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.
- 2. The total amount of coatings (this includes ink, thinner, and reducer) employed in this emissions unit shall not exceed 1500 gallons per year, based upon a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.

- 3. The total amount of cleanup material employed in this emissions unit shall not exceed 1000 gallons per year, based upon a rolling 12-month summation.

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4. All used, solvent soaked rags from the clean-up of this emissions unit shall be stored in containers with tightly fitting lids.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each month:

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- a. The company identification for each coating and cleanup material employed and documentation indicating whether or not the liquid organic material is photochemically reactive as defined by OAC 3745-21-01(C)(5).
- b. The number of gallons of each coating and cleanup material employed.
- c. The organic compound content of each coating and cleanup material, in pounds per gallon.
- d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per month ( b x c).
- e. The rolling, 12-month summation of the coating usage figures.
- f. The rolling, 12-month summation of the cleanup material usage figures.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following information each month for each emissions unit or process identified in term A.2.d of this permit:
  - a. The name and identification number of each coating employed.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. 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 (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
  - g. 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 (f)].
  - h. The number of gallons of each cleanup material employed.

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- i. 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 (b) times (d) for each coating plus the sum of (f) times (h) times (1 - the solvent recovery rate) for each cleanup material].
- j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coatings plus the sum of (g) times (h) times (1 - the solvent recovery rate) for each cleanup material];
- k. The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* 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.

3. The permit to install for this emissions unit R002 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: Ethylene glycol monomethyl ether

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 12.5

Predicted 1-Hour Maximum Ground-Level

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Concentration (ug/m3): 1105

MAGLC (ug/m3): 2881

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

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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 its 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 identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the

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use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

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2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings or cleanup solvents (i.e., for OC contents). 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 following the end of the calendar month.
3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.d. If no exceedances occurred, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation reports which identify any exceedance of the gallon usage limitations set forth in terms B.2 and B.3 (coating and cleanup material usage limitations) If no exceedances occurred, the permittee shall state so in the report.
5. 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. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the OC contents of the coatings and cleanup materials.
2. Compliance with the OC emission limitations specified in term A.1. shall be based upon the recordkeeping requirements as specified in term C.1.
3. Compliance with the usage limitations specified in term B.2. and B.3. shall be based upon the recordkeeping requirements as specified in term C.1.
4. Compliance with the HAP emissions limitation in term A.2.d shall be demonstrated by the recordkeeping in term C.2.

**F. Miscellaneous Requirements**

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 14-4492 as issued on July 15, 1998, and modified September 2, 1998.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, D and E.

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**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>
R004 - Inline 1 - five unit screen printing press for UV inks	OAC rule 3745-31-05(A)(3)	2.6 lbs/hr of organic compound (OC) emissions  11.4 TPY of OC emissions  See terms A.2.b, A.2.c., B.1., B.2., and B.3.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C).	See term A.2.d
	OAC rule 3745-21-07(G)	Exempt. (See term B.1.)

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with all applicable regulations, use of non-photochemically reactive materials, emission limitations, OC content and usage limitations.
- 2.b Only UV cured inks shall be employed in this emissions unit.

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- 2.c** The OC content of cleanup materials shall not exceed 6.75 pounds per gallon, unless the vapor pressure of the cleanup material is less than 10 mm Hg at standard temperature and pressure. The OC content of cleanup materials having vapor pressure less than 10 mmHg shall not exceed 13.50 pounds per gallon.
  
- 2.d** The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Ink room cleanup), P002 (Screen Reclamation process), R002 (Viking screen printing dryer), R004 ( Inline 1 - five unit screen printing press for UV inks), R005 (Inline 2 - four unit screen printing press for UV inks), the Kamori 640 printing press, the Kamori 526 printing press, and screen printing operations and associated clean up operations identified as LSP1, LSP2, LSP3, P1, P2, P3, E1, E2, S1, and S2 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.

- 2.e** The hourly emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

**B. Operational Restrictions**

1. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.
2. The total amount of cleanup material employed in this emissions unit shall not exceed 3377 gallons per year.
3. All used, solvent soaked rags from the clean-up of this emissions unit shall be stored in containers with tightly fitting lids.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each month:
  - a. The company identification for each cleanup material (liquid organic material) employed and documentation indicating whether or not the liquid organic material is photochemically reactive as defined by OAC rule 3745-21-01(C)(5).

- b. The number of gallons of each cleanup material employed.
- c. The organic compound content of each cleanup material, in pounds per gallon.
- d. The total organic compound emission rate for all cleanup materials, in pounds per month ( b x c).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 2. The permittee shall collect and record the following information each month for each emissions unit or process identified in term A.2.d of this permit:
  - a. The name and identification number of each coating employed.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. 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 (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
  - g. 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 (f)].
  - h. The number of gallons of each cleanup material employed.
  - i. 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 (b) times (d) for each coating plus the sum of (f) times (h) times (1 - the solvent recovery rate) for each cleanup material].
  - j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coatings plus the sum of (g)

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times (h) times (1 - the solvent recovery rate) for each cleanup material];

- k. The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the proceeding eleven calender months; and
- l. The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

\* 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.

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3. The permit to install for this emissions units R004 and R005 were 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: Methyl Ethyl Ketone (MEK)

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 1.1

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 134.3

MAGLC (ug/m3): 14,047

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

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- 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.).

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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 its 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 identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings or cleanup solvents (i.e., for OC contents). 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 following the end of the calendar month.
3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.d. If no exceedances occurred, the permittee shall state so in the report.
4. The permittee shall submit annual reports that specify the total amount of cleanup material employed during the previous calendar year. These reports shall be submitted by January 31 of

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each year.

5. 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. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the OC contents of the screen reclamation solvent.
2. Compliance with the OC emission limitations specified in term A.1. shall be based upon the recordkeeping requirements as specified in term C.1.
3. Compliance with the usage limitations specified in term B.2. shall be based upon the recordkeeping requirements as specified in term C.1.
4. Compliance with the HAP emissions limitation in term A.2.d shall be demonstrated by the recordkeeping in term C.2.

**F. Miscellaneous Requirements**

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

**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>
R005 - Inline 2 - four unit screen printing press for UV inks	OAC rule 3745-31-05(A)(3)	2.2 lbs/hr of organic compound (OC) emissions  9.76 TPY of OC emissions, including cleanup  See terms A.2.b, A.2.c., B.1., B.2., and B.3.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	See term A.2.d
	OAC rule 3745-21-07(G)	Exempt. (See term B.1.)

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with all applicable regulations, use of non-photochemically reactive materials, emission limitations, OC content and usage limitations.
- 2.b Only UV cured inks shall be employed in this emissions unit.
- 2.c The OC content of cleanup materials shall not exceed 6.75 pounds per gallon, unless the

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vapor pressure of the cleanup material is less than 10 mm Hg at standard temperature and pressure. The OC content of cleanup materials having vapor pressure less than 10 mmHg shall not exceed 13.50 pounds per gallon.

- 2.d** The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Ink room cleanup), P002 (Screen Reclamation process), R002 (Viking screen printing dryer), R004 (Inline 1 - five unit screen printing press for UV inks), R005 (Inline 2 - four unit screen printing press for UV inks), the Kamori 640 printing press, the Kamori 526 printing press, and screen printing operations and associated clean up operations identified as LSP1, LSP2, LSP3, P1, P2, P3, E1, E2, S1, and S2 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.

- 2.e** The hourly emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

**B. Operational Restrictions**

1. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.
2. The total amount of cleanup material employed in this emissions unit shall not exceed 2893 gallons per year.
3. All used, solvent soaked rags from the clean-up of this emissions unit shall be stored in containers with tightly fitting lids.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each month:
  - a. The company identification for each cleanup material (liquid organic material) employed and documentation indicating whether or not the liquid organic material is photochemically reactive as defined by OAC rule 3745-21-01(C)(5).

- b. The number of gallons of each cleanup material employed.
- c. The organic compound content of each cleanup material, in pounds per gallon.
- d. The total organic compound emission rate for all cleanup materials, in pounds per month ( b x c).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 2. The permittee shall collect and record the following information each month for each emissions unit or process identified in term A.2.d of this permit:
  - a. The name and identification number of each coating employed.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. 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 (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
  - g. 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 (f)].
  - h. The number of gallons of each cleanup material employed.
  - i. 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 (b) times (d) for each coating plus the sum of (f) times (h) times (1 - the solvent recovery rate) for each cleanup material].
  - j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coatings plus the sum of (g) times (h) times (1 - the solvent recovery rate) for each cleanup material];

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- k. The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the proceeding eleven calender months; and
- l. The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

\* 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.

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3. The permit to install for this emissions units R004 and R005 were 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: Methyl Ethyl Ketone (MEK)

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 1.1

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 134.3

MAGLC (ug/m3): 14,047

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

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- 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.).

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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 its 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 identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings or cleanup solvents (i.e., for VOC contents). 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 following the end of the calendar month.
3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.d. If no exceedances occurred, the permittee shall state so in the report.
4. The permittee shall submit annual reports that specify the total amount of cleanup material employed during the previous calendar year. These reports shall be submitted by January 31 of each year.

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5. 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. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the OC contents of the screen reclamation solvent.
2. Compliance with the OC emission limitations specified in term A.1. shall be based upon the recordkeeping requirements as specified in term C.1.
3. Compliance with the usage limitations specified in term B.2. shall be based upon the recordkeeping requirements as specified in term C.1.
4. Compliance with the HAP emissions limitation in term A.2.d shall be demonstrated by the recordkeeping in term C.2.

**F. Miscellaneous Requirements**

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