

Synthetic Minor Determination and/or  Netting Determination

PTI No. 14-05371

**A. Source Description**

Ampac Plastics, Inc. has submitted an application to install a new 6-color flexographic printing press, emissions unit K019. The press will use compliant coatings. The applicable regulations are OAC rules 3745-31-05(A)(3), 3745-31-05(D), 3745-21-09(Y)(1)(a), 3745-15-07 and 40 CFR Part 63 Subpart KK. The MACT rule of 40 CFR Part 63 Subpart KK is applicable for the specific sections of 40 CFR, Part 63.829(d) and Part 63.830(b)(1).

**B. Facility Emissions and Attainment Status**

Ampac Plastics Inc. is a large printing company with a PTI limit for VOC emissions of 96 TPY, for all flexographic printing presses at the facility combined. Based on the limit, the facility will remain minor for Title V purposes. Ampac is not subject to the entire MACT standard, but the specific sections noted above. Those sections require an initial notification and HAP recordkeeping. The facility is located in Hamilton County which is designated as attainment for PM/PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub> and CO and is designated non-attainment for VOC.

**C. Source Emissions**

To remain a minor facility, Ampac is accepting facility limits of 8 tons/month and 96 TPY VOC and a usage limit of 250,000 gallons per year of ink. The facility also is accepting limits of less than 10 TPY for any individual HAP and 25 TPY for any combined HAPs emissions. The facility will maintain monthly usage records to determine compliance with the emission limits.

**D. Conclusion**

The usage limits mentioned above will prevent this facility from becoming a major facility and triggering the Emissions Offset Policy or the Title V regulations. Monthly record keeping and quarterly reporting requirements will be used to demonstrate compliance.

Prepared by: Chris Boss  
Date prepared: October 29, 2002



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: 14-05371**

**CERTIFIED MAIL**

**DATE: 11/26/2002**

Ampac Plastics Inc  
Kenneth Turner  
12025 Tricon Road  
Cincinnati, OH 45246-1792

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 **\$200** 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

IN



**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 14-05371**

Application Number: 14-05371  
APS Premise Number: 1431420497  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Ampac Plastics Inc  
Person to Contact: Kenneth Turner  
Address: 12025 Tricon Road  
Cincinnati, OH 45246-1792

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

**12025 Tricon Road  
Cincinnati, Ohio**

Description of proposed emissions unit(s):

**Flexographic Printing Press.**

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

**Ampac Plastics Inc**

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

**Facility ID: 1431420497**

## **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

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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

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lead to such sanctions

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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 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**

- 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>
VOC	96.0

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Emissions Unit ID: **K019**

**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>
K019 - 6 Color Flexographic Printing Press #14	OAC rule 3745-31-05(A)(3)	4.76 lbs/hr VOC 20.85 TPY VOC
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), OAC rule 3745-31-05(D) and 40 CFR Part 63 Subpart KK.
	40 CFR Part 63 Subpart KK	See terms A.2.c. and B.1.
	OAC rule 3745-21-09(Y)(1)(a)	See term A.2.a. See term A.2.b.

**2. Additional Terms and Conditions**

- 2.a The actual usage of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP 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 upon issuance of the permit.

The MACT rule of 40 CFR Part 63 Subpart KK is applicable to this facility for the specific sections of 40 CFR, Part 63.829(d) and Part 63.830(b)(1).

- 2.b The VOC content of the coatings and inks employed in emissions unit K019 shall not exceed the following limitations:

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- i. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
  - ii. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.
- 2.c** The combined annual VOC emissions from flexographic printing presses #1, #2, #4, #5, #6, #7, #10, #12, #3, #8, #9, #11, #13 and #14 (OEPA emissions units K001, K002, K004, K005, K006, K007, K010, K013, K014, K015, K016, K017, K018 and K019) at Ampac Plastics, Inc. shall not exceed 8 tons per month and 96 tons per year.
- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of compliance coatings, usage and emission limits and compliance with the air toxics policy.
- 2.e** The hourly and annual emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

## **B. Operational Restrictions**

1. The maximum combined annual coating usage from flexographic printing presses #1, #2, #4, #5, #6, #7, #10, #12, #3, #8, #9, #11, #13 and #14 (OEPA emissions units K001, K002, K004, K005, K006, K007, K010, K013, K014, K015, K016, K017, K018 and K019) at Ampac Plastics, Inc. shall not exceed 250,000 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.

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

1. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number for each coating and cleanup material employed.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating and cleanup material in pounds of individual HAP per gallon of material, as applied.
  - c. The total combined HAP content of each coating and cleanup material in pounds of combined HAPs per gallon of material, as applied [sum all the individual HAP contents from (b)].
  - d. The VOC content of the coatings and cleanup materials used in pounds per gallon, as

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- e. The percent VOC by volume of each coating and cleanup material (excluding water and exempt solvents), as applied, or the percent VOC by volume of the volatile matter in the coating.
- f. The number of gallons of each coating and cleanup material employed.
- g. The total combined VOC emissions, in pounds or tons per month [the sum of (d) times (f) for each coating and cleanup material].
- h. The total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (f) for each coating and cleanup material].
- i. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (f) for each coating and cleanup material].
- j. The updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- k. The updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis. The HAP recordkeeping is required by 40 CFR Part 63.830(b)(1).

2. The permittee shall collect and record the following information each month:
  - a. The coating usage for each month.
  - b. The rolling, 12-month summation of the coating usage figures.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

3. The permit to install for this emissions unit (K019) 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

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each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: ammonia

TLV (ug/m3): 17,410

Maximum Hourly Emission Rate (lbs/hr): 0.466

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 50.0

MAGLC (ug/m3): 415

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. 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

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evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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- 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 of any exceedance of the HAP emissions limitations set forth in term A.2.a. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
2. The permittee shall submit quarterly reports which specify the total VOC emissions for each month from all flexographic printing presses (OEPA emissions units K001, K002, K004, K005, K006, K007, K010, K013, K014, K015, K016, K017, K018 and K019) at Ampac Plastics, Inc. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating usage limitation.
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. Compliance with the VOC and HAPs emission limitations in terms A.2.a and A.2.c shall be demonstrated by the record keeping requirements specified in term C.1.
2. Compliance with the VOC content limitations in these terms and conditions shall be determined in accordance with USEPA Method 24A. If, pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.
3. Compliance with the coating usage limitation in term B.1 shall be demonstrated by the

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recordkeeping requirements specified in term C.2.

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**F. Miscellaneous Requirements**

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