

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **14-05220**

A. Source Description

Color Resolutions International has applied for this PTI to re-organize some equipment into a new emissions unit. This emissions unit will be P062, Shot Mill #5 with premix and high shear agitation unit. The PTI will limit OC emissions to 5.40 TPY and HAPs will be limited to less than 10 TPY for any individual HAP and less than 25 TPY for any combination of HAPs.

B. Facility Emissions and Attainment Status

Color Resolutions International currently has a synthetic minor PTI in place (14-05004) that limits OC to 87.78 TPY OC, 1.723 TPY PM/PM10 and HAPs to less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs for the entire facility. This new PTI (14-05220) will limit emissions unit P062 to 5.40 TPY OC and 0.06 TPY PM/PM10, so the total facility emissions will still be under the Title V thresholds at 93.18 TPY OC and 1.783 TPY PM/PM10. This facility is located in Hamilton County which is designated at attainment for PM/PM10 and non-attainment for OC.

C. Source Emissions

This synthetic minor permit will limit potential emissions by annual OC emission limitations and annual ink production limits. These limits, as well as the HAPs limits, are based on a rolling, 12-month summation. Maximum OC content requirements are also included. Daily and monthly record keeping and quarterly and annual reporting will ensure compliance with all limitations. The PTE for emissions unit P062 is 8.76 TPY OC, but this permit will limit emissions to 5.40 TPY OC. The HAPs recordkeeping will be carried over in this permit as well in order to ensure that the facility keeps each individual HAP to less than 10 TPY and all HAPs combined to less than 25 TPY.

D. Conclusion

The terms and conditions in the Permit to Install will limit this emissions unit to 5.40 TPY OC and less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon a rolling, 12-month summation. Daily and monthly records of the inks produced, along with deviation and annual OC, HAPs and production reports will be required to assure compliance. By limiting the potential OC emissions for this emissions unit to 5.40 TPY, the facility will remain under the major threshold, and will not trigger the Emission Offset Policy or the Title V requirements.



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 CERTIFIED MAIL
HAMILTON COUNTY
Application No: 14-05220

DATE: 11/6/2001

Color Resolutions International
Bryan Wisecup
630 Glendale-Milford Road
Cincinnati, OH

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 \$400 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,

Handwritten signature of Thomas G. Rigo

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

CC: USEPA HCDES Ohio-Kentucky-Indiana Reg Coun 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 14-05220

Application Number: 14-05220
APS Premise Number: 1431484065
Permit Fee: **To be entered upon final issuance**
Name of Facility: Color Resolutions International
Person to Contact: Bryan Wisecup
Address: 630 Glendale-Milford Road
Cincinnati, OH 45215

Location of proposed air contaminant source(s) [emissions unit(s)]:
**630 Glendale-Milford Road
Cincinnati, Ohio**

Description of proposed emissions unit(s):
Shot Mill No. 5 with premix and high shear agitation unit.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS**A. Permit to Install General Terms and Conditions****1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

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

Color Resolutions International

Facility ID: 1431484065

PTI Application: 14-05220

Issued: To be entered upon final issuance

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

Color Resolutions International

Facility ID: 1431484065

PTI Application: 14-05220

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 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

Color Resolutions International

Facility ID: 1431484065

PTI Application: 14-05220

Issued: To be entered upon final issuance

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 thirty (30) 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	5.40
PM/PM10	0.06

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

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-11
P062 - Shot Mill No. 5 with premix and high shear agitation unit	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-07(G)(2)	

Color

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **P062**

Applicable Emissions
Limitations/Control Measures

2.40 lbs/hr OC
40.0 lbs/day OC

0.02 lb/hr PM/PM10
0.06 TPY PM/PM10

See term A.2.b

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-31-05(D).

5.40 TPY OC, based on a rolling, 12-month summation.

See terms A.2.c. and B.1

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

See term A.2.a.

2. Additional Terms and Conditions

Colorado

Permit

Emissions Unit ID: P062

Issued: To be entered upon final issuance

- 2.a** Visible particulate emissions from the fabric filter exhaust stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.b** The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
- 2.c** The actual emissions 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 already has existing HAPs records, therefore, HAPs emission limits for the first 12 months of operation following the issuance of this permit are not required.

- 2.d** The hourly emission limitation for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.e** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of tight-fitting covers, the use of a fabric filter, compliance with OC and PM/PM10 emission limitations and production limitations.

B. Operational Restrictions

1. The maximum annual ink production rate for this emissions unit shall not exceed 18,000,000 pounds, based on a rolling, 12-month summation of the production rates.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production limits specified in the following table:

<u>Months</u>	<u>Maximum allowable cumulative ink production, in pounds</u>
1-	1,500,000
1-2	3,000,000
1-3	4,500,000
1-4	6,000,000
1-5	7,500,000
1-6	9,000,000

Colorado

Permit

Emissions Unit ID: P062

Issued: To be entered upon final issuance

1-7	10,500,000
1-8	12,000,000
1-9	13,500,000
1-10	15,000,000
1-11	16,500,000
1-12	18,000,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production limits shall be based on a rolling, 12-month summation of the ink production figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification of each batch of ink produced.
 - b. The OC content for each ink produced, in percent by weight.
 - c. The amount of each ink produced, in pounds.
 - d. The total OC emissions from each ink produced, in pounds, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83).

2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the ink production figures, in pounds. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative ink production figures for each calendar month.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative total combined OC emissions for each calendar month.
 - c. The amount of pigments (non-volatiles/solids) employed in tons.

- d. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a fabric filter control efficiency of (1-.98).
3. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each HAP-containing ink produced;
 - b. The individual HAP content for each HAP of each HAP-containing ink in pounds of individual HAP per pound of HAP-containing ink, as produced;
 - c. The total combined HAP content of each HAP-containing ink in pounds of combined HAPs per pound of HAP-containing ink, as produced [sum all the individual HAP contents from (b)];
 - d. The number of pounds of each HAP-containing ink produced;
 - e. The name and identification of each HAP-containing cleanup material employed;
 - f. The individual HAP content for each HAP of each HAP-containing cleanup material, in pounds of individual HAP per pound of HAP-containing cleanup material, as applied;
 - g. The total combined HAP content of each HAP-containing cleanup material, in pounds of combined HAPs per pound of HAP-containing cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h. The number of pounds of each HAP-containing cleanup material employed;
 - i. The total individual HAP emissions for each HAP from all HAP-containing inks produced and HAP-containing cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) times (emission factor as referenced in term C.1.) for each HAP-containing ink plus the sum of (f) times (h) times (1-recovery %) for each HAP-containing cleanup material];
 - j. The total combined HAP emissions from all HAP-containing inks produced and HAP-containing cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) times (emission factor as referenced in term C.1.) for each HAP-containing ink plus the sum of (g) times (h) times (1-recovery %) for each HAP-containing cleanup material];

Color

PTI /

Emissions Unit ID: **P062**

Issued: To be entered upon final issuance

- 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.

Colo

PTI

Emissions Unit ID: **P062****Issued: To be entered upon final issuance**

* 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 of any exceedance of the HAP emission limitations set forth in term A.2.c. 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 updated rolling, 12-month summation of total ink production in pounds from this emissions unit for each calendar month. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall submit reports which specify the cumulative total ink production in pounds for each calendar month.
3. The permittee shall submit deviation reports which identify all exceedances of the OC content limitations in term A.2.b.
4. 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 visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.
2. Compliance with the percent by weight OC content limit in term A.2.b shall be determined by the record keeping requirements as specified in term C.1.
3. Compliance with the OC emission limitations in this permit shall be determined in accordance with the emission factors provided by AP-42 Table 6.4-1 (5/83) and the record keeping requirements as specified in terms C.1. and C.2.
4. Compliance with the PM-PM10 emission limitations in this permit shall be determined in accordance with the emission factors provided by AP-42 Table 6.7-1 (5/83) and the record keeping requirements as specified in term C.2.

Color Resolutions International

PTI Application 14-05330

Issue

Facility ID: 1431484065

Emissions Unit ID: P062

5. Compliance with the ink production limitation in term B.1 shall be determined by the record keeping requirements as specified in terms C.1. and C.2.
6. Compliance with the HAPs limitations in term A.2.c. shall be determined by the record keeping requirements as specified in term C.3.

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.

NEW SOURCE REVIEW FORM B

PTI Number: 14-05220 Facility ID: 1431484065

FACILITY NAME Color Resolutions International

FACILITY DESCRIPTION Shot Mill No. 5 with premix and high shear agitation unit CITY/TWP Cincinnati

SIC CODE 2893 SCC CODE 3-01-020-32 EMISSIONS UNIT ID P062

EMISSIONS UNIT DESCRIPTION Shot Mill No. 5 with premix and high shear agitation unit

DATE INSTALLED 11/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.02 lb/hr	0.06	0.02 lb/hr	0.06
PM ₁₀	Attainment	0.02 lb/hr	0.06	0.02 lb/hr	0.06
Sulfur Dioxide					
Organic Compounds	Non-attainment	2.4 lbs/hr; 40 lbs/day	1.51	2.4 lbs/hr; 40 lbs/day	5.40
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

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

BAT has been determined to be compliance with all applicable rules, the use of tight-fitting covers, the use of a fabric filter, compliance with OC and PM/PM10 emission limitations and production limitations.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	Electronic	Additional information File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Modeling form/results	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
PTI Application (complete or partial)*	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

NEW SOURCE REVIEW FORM B

PTI Number: 14-05220 Facility ID: 1431484065

FACILITY NAME Color Resolutions International

FACILITY DESCRIPTION Shot Mill No. 5 with premix and high shear agitation unit CITY/TWP Cincinnati

BAT Study	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other/misc.	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

[NSR Discussion](#)**PERMIT REVIEW NARRATIVE****14-05220**

Color Resolutions International
630 Glendale-Milford Road
Cincinnati, OH 45215

PN: 1431484065

Color Resolutions International is a manufacturer of inks. This PTI is to re-permit equipment that was originally installed in the facility prior to 1974, but is now being reorganized into a different emissions unit (some of the equipment was originally permitted in emissions unit P001). Since this has the potential to have increased emissions from the new organization of equipment, this will be processed as a PTI. The facility currently has a synthetic minor PTI limiting all other operations to 87.78 TPY OC, and would like this PTI to also have federally enforceable limits in order to keep the PTE for OC less than 100 TPY from the facility. This emissions unit will be assigned P062, Shot Mill #5 with premix and high shear agitation unit.

Emissions unit P062 will have a maximum VOC content of 2.92%, so this will fall into the Very Low VOC Category group, for inks produced with a VOC content of 4% or less. The OC emission factors for this category are from AP-42 Table 6.4-1 (5/83).

This emissions unit operates on a batch cycle. Therefore, the potential emissions were calculated based on the minimum batch time and the maximum batch loads. There are also minimum down-time requirements for cleaning the equipment and setting up for the next batch. These numbers are represented in the calculations for the Potential to Emit.

The OAC rules governing this emissions unit are OAC rules 3745-31-05(A)(3), 3745-31-05(D), 3745-21-07(G)(2), 3745-17-11, 3745-17-07(A)(1) and 3745-15-07.

The limitations for TPY OC and the pounds of ink produced per year are based on rolling, 12-month summations. Monthly record keeping and quarterly reporting will ensure compliance with these limits. Since the daily potential emissions are 48 lbs/day, the PTI will limit the lbs/day OC to 40 lbs/day. Daily record keeping is required to demonstrate compliance with the 40 lbs/day limitation. HAPs record keeping is already in place for the facility, and will be carried over in this PTI. Monthly record keeping and annual reporting will demonstrate compliance with the HAPs limitations.

NEW SOURCE REVIEW FORM B

PTI Number: 14-05220 Facility ID: 1431484065

FACILITY NAME Color Resolutions International

FACILITY DESCRIPTION	CITY/TWP
Shot Mill No. 5 with premix and high shear agitation unit	Cincinnati

This synthetic minor PTI will limit potential emissions from this emissions unit to 5.40 TPY OC and 0.06 TPY PM/PM10. This will bring the total facility PTE up to 93.18 TPY OC and 1.783 TPY PM/PM10. The potential OC emissions from this emissions unit are 8.76 TPY. By keeping the facility at less than 100 TPY OC, the emissions offset policy and Title V requirements will not be applicable.

Each air toxic will have a maximum emission rate of less than 1.0 TPY, therefore the Air Toxics Policy does not apply to this emissions unit and SCREEN3 modeling is not required.

BAT for emissions units P062 has been determined to be compliance with all applicable rules, the use of tight-fitting covers, the use of a fabric filter, compliance with OC and PM/PM10 emission limitations and production limitations.

A draft PTI should be issued.

The permit fee is:

Process between 1,001 and 5,000 lbs/hr = **\$400**

Prepared by: Kari Ball

Date prepared: October 1, 2001

Please complete for these type permits ([For PSD/NSR Permit, place mouse over this text](#)):

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install ENTER PTI NUMBER HERE

A. Source Description

Color Resolutions International has applied for this PTI to re-organize some equipment into a new emissions unit. This emissions unit will be P062, Shot Mill #5 with premix and high shear agitation unit. The PTI will limit OC emissions to 5.40 TPY and HAPs will be limited to less than 10 TPY for any individual HAP and less than 25 TPY for any combination of HAPs.

B. Facility Emissions and Attainment Status

Color Resolutions International currently has a synthetic minor PTI in place (14-05004) that limits OC to 87.78 TPY OC, 1.723 TPY PM/PM10 and HAPs to less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs for the entire facility. This new PTI (14-05220) will limit emissions unit P062 to 5.40 TPY OC and 0.06 TPY PM/PM10, so the total facility emissions will still be under the Title V thresholds at 93.18 TPY OC and 1.783 TPY PM/PM10. This facility is located in Hamilton County which is designated at attainment for PM/PM10 and non-attainment for OC.

C. Source Emissions

NEW SOURCE REVIEW FORM B

PTI Number: 14-05220 Facility ID: 1431484065

FACILITY NAME Color Resolutions International

FACILITY DESCRIPTION Shot Mill No. 5 with premix and high shear agitation unit CITY/TWP Cincinnati

This synthetic minor permit will limit potential emissions by annual OC emission limitations and annual ink production limits. These limits, as well as the HAPs limits, are based on a rolling, 12-month summation. Maximum OC content requirements are also included. Daily and monthly record keeping and quarterly and annual reporting will ensure compliance with all limitations. The PTE for emissions unit P062 is 8.76 TPY OC, but this permit will limit emissions to 5.40 TPY OC. The HAPs recordkeeping will be carried over in this permit as well in order to ensure that the facility keeps each individual HAP to less than 10 TPY and all HAPs combined to less than 25 TPY.

D. Conclusion

The terms and conditions in the Permit to Install will limit this emissions unit to 5.40 TPY OC and less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon a rolling, 12-month summation. Daily and monthly records of the inks produced, along with deviation and annual OC, HAPs and production reports will be required to assure compliance. By limiting the potential OC emissions for this emissions unit to 5.40 TPY, the facility will remain under the major threshold, and will not trigger the Emission Offset Policy or the Title V requirements.

Prepared by: Kari Ball
Date prepared: October 1, 2001

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	5.40
PM/PM10	0.06