



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
WARREN COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05560

Fac ID: 1483060398

DATE: 9/23/2004

Flint Ink Corp
George Pylar
2675 Henkle Drive
Lebanon, OH 45036-0000

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 9/23/2004
Effective Date: 9/23/2004**

FINAL PERMIT TO INSTALL 14-05560

Application Number: 14-05560
Facility ID: 1483060398
Permit Fee: **\$6800**
Name of Facility: Flint Ink Corp
Person to Contact: George Pylar
Address: 2675 Henkle Drive
Lebanon, OH 45036-0000

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

**2675 Henkle Dr
Lebanon, Ohio**

Description of proposed emissions unit(s):

Chapter 31 Modification to PTI 14-04620, issued 12/8/99, to increase the facility-wide Synthetic Minor Potential to Emit OC and HAPs emissions; installation of 10 new ink mixing operations.

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

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources 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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

6

Flint Ink Corp

PTI Application: 14-05560

Issued: 9/23/2004

Facility ID: 1483060398

Flint Ink Corp
 PTI Application: 14-05560
 Issued: 9/23/2004

Facility ID: 1483060398

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	75.64
PM/PM10	0.15

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 - Dispersions Dept. 2000 gal. Mixer G305 with fabric filter	OAC rule 3745-31-05(A)(3)	6.8 lbs OC emissions/hr 0.015 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	23.96 TPY OC emissions based on a rolling, 12-month summation, emissions units P001 and P002 combined.

0.05 TPY PM/PM10 emissions
based on a rolling, 12-month
summation, emissions units P001
and P002, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P001 and P002, combined, shall not exceed 22,817,000 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Maximum Allowable Cumulative

<u>Month</u>	<u>Coating and Ink Production (pounds)</u>
1	1,901,417
1-2	3,802,833
1-3	5,704,250
1-4	7,605,667
1-5	9,507,083
1-6	11,408,500
1-7	13,309,917
1-8	15,211,333
1-9	17,112,750
1-10	19,014,167
1-11	20,915,583
1-12	22,817,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by

Emissions Unit ID: P001

the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P001 and P002, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;

- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
 - e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
 - f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
 - g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);
 - h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
 - i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
 - j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
 - k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
- * 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.
4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42,

Emissions Unit ID: P001

Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.
6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 0.00077, P001 through P023, combined

MAGLC ($\mu\text{g}/\text{m}^3$): 119

Pollutant: toluene (HAP)

TLV ($\mu\text{g}/\text{m}^3$):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 3236 P001 through P023, combined

MAGLC ($\mu\text{g}/\text{m}^3$): 4476

Physical changes to or in the method of operation of the emissions units 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,

Emissions Unit ID: P001

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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month

Emissions Unit ID: **P001**

coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P001 and P002, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and/or PM/PM10 emissions limit occurred for emissions units P001 and P002, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in term A.2.a. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term B.2. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively)
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P001 and P002, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

6.8 lbs OC emissions/hr
 0.015 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated

by the methods outlined in term C.1.

2. Emissions Limitation

0.05 TPY PM/PM10 emissions, emissions units P001 and P002, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P001 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P002.

3. Emissions Limitation

23.96 TPY OC emissions based on a rolling, 12-month summation, emissions units P001 and P002 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P001**

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21, 1999 and modified on December 8, 1999.

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 - Dispersions Dept. 2000 gal. Mixer G308 with fabric filter	OAC rule 3745-31-05(A)(3)	6.8 lbs OC emissions/hr 0.015 lbs PM/PM10 emissions/hr
		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(C).
		See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	23.96 TPY OC emissions based on a rolling, 12-month summation,

emissions units P001 and P002 combined.

0.05 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P001 and P002, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P001 and P002, combined, shall not exceed 22,817,000 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Flint I
PTI A
Issued: 9/23/2004

Emissions Unit ID: **P002**

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
1	1,901,417
1-2	3,802,833
1-3	5,704,250
1-4	7,605,667
1-5	9,507,083
1-6	11,408,500
1-7	13,309,917
1-8	15,211,333
1-9	17,112,750
1-10	19,014,167
1-11	20,915,583
1-12	22,817,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be

calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P001 and P002, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;

Emissions Unit ID: P002

- c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);
- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P002**

deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.
6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County

Emissions Unit ID: P002

Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P001 and P002, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and/or PM/PM10 emissions limit occurred for emissions units P001 and P002, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in term A.2.a. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term B.2. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively)
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P001 and P002, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

6.8 lbs OC emissions/hr
 0.015 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in term C.1.

2. Emissions Limitation

0.05 TPY PM/PM10 emissions, emissions units P001 and P002, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P001 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P002.

3. Emissions Limitation

23.96 TPY OC emissions based on a rolling, 12-month summation, emissions units P001 and P002 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Flint Ink Corp
PTI Application: 14-05560
Issued

Facility ID: 1483060398

Emissions Unit ID: **P002**

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Dispersions Dept. 1000 gal. Mixer G306 with fabric filter	OAC rule 3745-31-05(A)(3)	6.2 lbs OC emissions/hr 0.008 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	11.79 TPY OC emissions based on a rolling, 12-month summation, emissions units P003 and P004 combined.

Flint I
PTI A
Issued: 9/23/2004

Emissions Unit ID: **P003**

0.02 TPY PM/PM10 emissions,
based on a rolling, 12-month
summation, emissions units P003
and P004, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P003 and P004, combined, shall not exceed 9,822,400 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Maximum Allowable Cumulative

<u>Month</u>	<u>Coating and Ink Production (pounds)</u>
1	818,533
1-2	1,637,067
1-3	2,455,600
1-4	3,274,133
1-5	4,092,667
1-6	4,911,200
1-7	5,729,733
1-8	6,548,267
1-9	7,366,800
1-10	8,185,333
1-11	9,003,867
1-12	9,822,400

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb

PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P003 and P004, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;

- b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
- a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
 - e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
 - f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;

Flint Ink Corp
PTI Application: 14-05560
Issued

Facility ID: 1483060398

Emissions Unit ID: **P003**

- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023,

combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P003 and P004, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P003 and P004, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P003 and P004, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

6.2 lbs OC emissions/hr
0.008 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Term C.1.

2. Emissions Limitation

0.02 TPY PM/PM10 emissions, emissions units P003 and P004, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P003 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P004.

3. Emissions Limitation

11.79 TPY OC emissions based on a rolling, 12-month summation, emissions units P003 and P004 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping in term C.2.

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P003**

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P004 - Dispersions Dept. 1000 gal. Mixer G307 with fabric filter	OAC rule 3745-31-05(A)(3)	6.2 lbs OC emissions/hr 0.008 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	11.79 TPY OC emissions based on a rolling, 12-month summation, emissions units P003 and P004 combined.

Flint I
PTI A
Issued: 9/23/2004

Emissions Unit ID: **P004**

0.02 TPY PM/PM10 emissions,
based on a rolling, 12-month
summation, emissions units P003
and P004, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit’s Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

- 1. The maximum annual coatings and inks production rate for emissions units P003 and P004, combined, shall not exceed 9,822,400 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
--------------	---

1	818,533
1-2	1,637,067
1-3	2,455,600
1-4	3,274,133
1-5	4,092,667
1-6	4,911,200
1-7	5,729,733
1-8	6,548,267
1-9	7,366,800
1-10	8,185,333
1-11	9,003,867
1-12	9,822,400

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb

Flint Ink Corp
PTI Application: 14-05560
Issued

Facility ID: 1483060398

Emissions Unit ID: **P004**

PM/PM10/ton solids)then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P003 and P004, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;

- b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
- a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
 - e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
 - f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;

- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
 - i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
 - j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
 - k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
- * 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.
4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.
5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: P004

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P003 and P004, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P003 and P004, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P003 and P004, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

6.2 lbs OC emissions/hr
0.008 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Term C.1.

2. Emissions Limitation

0.02 TPY PM/PM10 emissions, emissions units P003 and P004, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P003 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P004.

3. Emissions Limitation

11.79 TPY OC emissions based on a rolling, 12-month summation, emissions units P003 and P004 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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>
P005 - Milling Dept. 500 gal. Mixer/Mill/Blender G302 with fabric filter	OAC rule 3745-31-05(A)(3)	0.9 lbs OC emissions/hr 0.001 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	4.84 TPY OC emissions based on a rolling, 12-month summation, emissions units P005 and P006

combined.

0.01 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P005 and P006, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P005 and P006, combined, shall not exceed 5,688,920 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Maximum Allowable Cumulative

<u>Month</u>	<u>Coating and Ink Production (pounds)</u>
1	1,000,000
1-2	2,000,000
1-3	2,844,460
1-4	2,844,460
1-5	2,844,460
1-6	2,844,460
1-6	2,844,460
1-7	3,318,537
1-8	3,792,613
1-9	4,266,690
1-10	4,740,767
1-11	5,214,843
1-12	5,688,920

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be

calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P005 and P006, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;

Emissions Unit ID: **P005**

- c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: P005

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units still satisfies the "Air Toxic Policy"; and

Emissions Unit ID: P005

- 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P005 and P006, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P005 and P006, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations after the first 12 calendar months of operation. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P005 and P006, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

0.9 lbs OC emissions/hr
0.001 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.01 TPY PM/PM10 emissions, emissions units P005 and P006, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P005 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P006.

3. Emissions Limitation

4.84 TPY OC emissions based on a rolling, 12-month summation, emissions units P005 and P006 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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>
P006 - Milling Dept. 500 gal. Mixer/Mill/Blender G304 with fabric filter	OAC rule 3745-31-05(A)(3)	0.9 lbs OC emissions/hr 0.001 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	4.84 TPY OC emissions based on a rolling, 12-month summation, emissions units P005 and P006 combined.

0.01 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P005 and P006, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P005 and P006, combined, shall not exceed 5,688,920 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Maximum Allowable Cumulative

<u>Month</u>	<u>Coating and Ink Production (pounds)</u>
1	1,000,000
1-2	2,000,000
1-3	2,844,460
1-4	2,844,460
1-5	2,844,460
1-6	2,844,460
1-6	2,844,460
1-7	3,318,537
1-8	3,792,613
1-9	4,266,690
1-10	4,740,767
1-11	5,214,843
1-12	5,688,920

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the

emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P005 and P006, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent

(%) by weight;

- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: P006

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P005 and P006, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P005 and P006, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations after the first 12 calendar months of operation. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P005 and P006, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

0.9 lbs OC emissions/hr
0.001 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.01 TPY PM/PM10 emissions, emissions units P005 and P006, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P005 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P006.

3. Emissions Limitation

4.84 TPY OC emissions based on a rolling, 12-month summation, emissions units P005 and P006 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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>
P007 - Milling Dept. HM-40 Mill/Blender G404 with fabric filter	OAC rule 3745-31-05(A)(3)	0.3 lbs OC emissions/hr 0.001 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	1.84 TPY OC emissions based on a rolling, 12-month summation, emissions units P007 and P008 combined.

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P007**

0.01 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P007 and P008, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P007 and P008, combined, shall not exceed 4,086,720 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Maximum Allowable Cumulative

<u>Month</u>	<u>Coating and Ink Production (pounds)</u>
1	350,000
1-2	700,000
1-3	1,050,000
1-4	1,400,000
1-5	1,750,000
1-6	2,043,360
1-7	2,383,920
1-8	2,724,480
1-9	3,065,040
1-10	3,405,600
1-11	3,746,160
1-12	4,086,720

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then

multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P007 and P008, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;

- b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
- a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
 - e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
 - f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;

Flint Ink Corp
PTI Application: 14-05560
Issued

Facility ID: 1483060398

Emissions Unit ID: **P007**

- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023,

combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P007 and P008, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P007 and P008, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P007 and P008, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

0.3 lbs OC emissions/hr
0.001 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.01 TPY PM/PM10 emissions, emissions units P007 and P008, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P007 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P008.

3. Emissions Limitation

1.84 TPY OC emissions based on a rolling, 12-month summation, emissions units P007 and P008 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P008 - Milling Dept. HM-40 Mill/Blender G405 with fabric filter	OAC rule 3745-31-05(A)(3)	0.3 lbs OC emissions/hr 0.001 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	1.84 TPY OC emissions based on a rolling, 12-month summation, emissions units P007 and P008 combined.

Flint I
PTI A
Issued: 9/23/2004

Emissions Unit ID: **P008**

0.01 TPY PM/PM10 emissions,
 based on a rolling, 12-month
 summation, emissions units P007
 and P008, combined.
 See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P007 and P008, combined, shall not exceed 4,086,720 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
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Flint I
PTI A
Issued: 9/23/2004

Emissions Unit ID: **P008**

1	350,000
1-2	700,000
1-3	1,050,000
1-4	1,400,000
1-5	1,750,000
1-6	2,043,360
1-7	2,383,920
1-8	2,724,480
1-9	3,065,040
1-10	3,405,600
1-11	3,746,160
1-12	4,086,720

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

Flint Ink Corp
PTI Application: 14-05560
Issued

Facility ID: 1483060398

Emissions Unit ID: **P008**

2. The permittee shall maintain monthly records of the following information for emissions units P007 and P008, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;

- b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
- a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
 - e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
 - f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;

- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
 - i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
 - j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
 - k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
- * 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.
4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.
- * 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.
5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: **P008**

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P007 and P008, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P007 and P008, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P007 and P008, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

0.3 lbs OC emissions/hr
0.001 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.01 TPY PM/PM10 emissions, emissions units P007 and P008, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P007 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P008.

3. Emissions Limitation

1.84 TPY OC emissions based on a rolling, 12-month summation, emissions units P007 and P008 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping in term C.2.

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P008**

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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>
P009 - Dispersions Dept. 50 hp Disperser D418 with fabric filter	OAC rule 3745-31-05(A)(3)	1.7 lbs OC emissions/hr 0.007 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	See T&C A.2.c. Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	3.67 TPY OC emissions, based on a rolling, 12-month summation, emissions units P009 through P016

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P009**

combined.

0.03 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P009 through P016, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P009 through P016, combined, shall not exceed 9,175,400 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Maximum Allowable Cumulative

<u>Month</u>	<u>Coating and Ink Production (pounds)</u>
1	800,000
1-2	1,600,000
1-3	2,400,000
1-4	3,200,000
1-5	4,000,000
1-6	4,587,700
1-6	4,587,700
1-7	5,352,317
1-8	6,116,933
1-9	6,881,550
1-10	7,646,167
1-11	8,410,783
1-12	9,175,400

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be

calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P009 through P016, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P009**

- c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
 - i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
 - j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
 - k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
- * 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.
4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.
5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: P009

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P009 through P016, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P009 through P016, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P009 through P016, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.7 lbs OC emissions/hr
0.007 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.03 TPY PM/PM10 emissions, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P009 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summations of the emissions from emissions units P010 thru P016.

3. Emissions Limitation

3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P009**

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P010 - Dispersions Dept. 50 hp Disperser D419 with fabric filter	OAC rule 3745-31-05(A)(3)	1.7 lbs OC emissions/hr 0.007 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016 combined.

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P010**

0.03 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P009 through P016, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P009 through P016, combined, shall not exceed 9,175,400 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Maximum Allowable Cumulative

<u>Month</u>	<u>Coating and Ink Production (pounds)</u>
1	800,000
1-2	1,600,000
1-3	2,400,000
1-4	3,200,000
1-5	4,000,000
1-6	4,587,700
1-6	4,587,700
1-7	5,352,317
1-8	6,116,933
1-9	6,881,550
1-10	7,646,167
1-11	8,410,783
1-12	9,175,400

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the

emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P009 through P016, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P010**

(%) by weight;

- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
 - i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
 - j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
 - k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
- * 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.
4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.
5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: P010

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P009 through P016, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P009 through P016, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P009 through P016, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.7 lbs OC emissions/hr
0.007 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.03 TPY PM/PM10 emissions, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P009 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summations of the emissions from emissions units P010 thru P016.

3. Emissions Limitation

3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P010**

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping in term C.2.

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P010**

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P011 - Dispersions Dept. 50 hp Disperser D420 with fabric filter	OAC rule 3745-31-05(A)(3)	1.7 lbs OC emissions/hr 0.007 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	See T&C A.2.c. Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016 combined.

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P011**

0.03 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P009 through P016, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P009 through P016, combined, shall not exceed 9,175,400 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Maximum Allowable Cumulative

<u>Month</u>	<u>Coating and Ink Production (pounds)</u>
1	800,000
1-2	1,600,000
1-3	2,400,000
1-4	3,200,000
1-5	4,000,000
1-6	4,587,700
1-6	4,587,700
1-7	5,352,317
1-8	6,116,933
1-9	6,881,550
1-10	7,646,167
1-11	8,410,783
1-12	9,175,400

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the

emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P009 through P016, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent

(%) by weight;

- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
 - i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
 - j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
 - k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
- * 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.
4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.
- * 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.
5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023,

combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P009 through P016, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P009 through P016, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P009 through P016, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.7 lbs OC emissions/hr
0.007 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.03 TPY PM/PM10 emissions, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P009 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summations of the emissions from emissions units P009 through P016.

3. Emissions Limitation

3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P012 - Dispersions Dept. 50 hp Disperser D421 with fabric filter	OAC rule 3745-31-05(A)(3)	1.7 lbs OC emissions/hr 0.007 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016 combined.

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P012**

0.03 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P009 through P016, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P009 through P016, combined, shall not exceed 9,175,400 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
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1	800,000
1-2	1,600,000
1-3	2,400,000
1-4	3,200,000
1-5	4,000,000
1-6	4,587,700
1-6	4,587,700
1-7	5,352,317
1-8	6,116,933
1-9	6,881,550
1-10	7,646,167
1-11	8,410,783
1-12	9,175,400

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the

Emissions Unit ID: **P012**

emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P009 through P016, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;

- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: P012

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P009 through P016, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P009 through P016, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P009 through P016, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.7 lbs OC emissions/hr
0.007 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.03 TPY PM/PM10 emissions, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P009 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summations of the emissions from emissions units P009 through P016.

3. Emissions Limitation

3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 de minimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks de minimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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>
P013 - Dispersions Dept. 30 hp Disperser D416 with fabric filter	OAC rule 3745-31-05(A)(3)	1.7 lbs OC emissions/hr 0.007 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016

combined.

0.03 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P009 through P016, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P009 through P016, combined, shall not exceed 9,175,400 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Maximum Allowable Cumulative

Flint I
PTI A
Issued: 9/23/2004

Emissions Unit ID: **P013**

<u>Month</u>	<u>Coating and Ink Production (pounds)</u>
1	800,000
1-2	1,600,000
1-3	2,400,000
1-4	3,200,000
1-5	4,000,000
1-6	4,587,700
1-6	4,587,700
1-7	5,352,317
1-8	6,116,933
1-9	6,881,550
1-10	7,646,167
1-11	8,410,783
1-12	9,175,400

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be

calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P009 through P016, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P013**

- c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: **P013**

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P009 through P016, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P009 through P016, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P009 through P016, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.7 lbs OC emissions/hr
0.007 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.03 TPY PM/PM10 emissions, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P009 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summations of the emissions from the other seven emissions units in the group.

3. Emissions Limitation

3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016, combined.

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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>
P014 - Dispersions Dept. 30 hp Disperser D417 with fabric filter	OAC rule 3745-31-05(A)(3)	1.7 lbs OC emissions/hr 0.007 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016 combined.

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P014**

0.03 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P009 through P016, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P009 through P016, combined, shall not exceed 9,175,400 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Maximum Allowable Cumulative

<u>Month</u>	<u>Coating and Ink Production (pounds)</u>
1	800,000
1-2	1,600,000
1-3	2,400,000
1-4	3,200,000
1-5	4,000,000
1-6	4,587,700
1-6	4,587,700
1-7	5,352,317
1-8	6,116,933
1-9	6,881,550
1-10	7,646,167
1-11	8,410,783
1-12	9,175,400

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the

emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P009 through P016, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P014**

(%) by weight;

- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
 - i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
 - j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
 - k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
- * 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.
4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.
- * 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.
5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: P014

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P009 through P016, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P009 through P016, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P009 through P016, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.7 lbs OC emissions/hr
0.007 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.03 TPY PM/PM10 emissions, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P009 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summations of the emissions from emissions units P009 through P016.

3. Emissions Limitation

3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016, combined.

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P014**

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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>
P015 - Dispersions Dept. 30 hp Disperser D414 with fabric filter	OAC rule 3745-31-05(A)(3)	1.7 lbs OC emissions/hr 0.007 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016 combined.

Flint I
PTI A
Issued: 9/23/2004

Emissions Unit ID: **P015**

0.03 TPY PM/PM10 emissions,
based on a rolling, 12-month
summation emissions units P009
through P016, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P009 through P016, combined, shall not exceed 9,175,400 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
1	800,000
1-2	1,600,000
1-3	2,400,000
1-4	3,200,000
1-5	4,000,000
1-6	4,587,700
1-6	4,587,700
1-7	5,352,317
1-8	6,116,933
1-9	6,881,550
1-10	7,646,167
1-11	8,410,783
1-12	9,175,400

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be

calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P009 through P016, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P015**

- c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023,

combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P009 through P016, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P009 through P016, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P009 through P016, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.7 lbs OC emissions/hr
0.007 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.03 TPY PM/PM10 emissions, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P009 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summations of the emissions from emissions units P009 through P016.

3. Emissions Limitation

3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units.

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping in term C.2.

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P015**

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P016 - Dispersions Dept. 30 hp Disperser D415 with fabric filter	OAC rule 3745-31-05(A)(3)	1.7 lbs OC emissions/hr 0.007 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016 combined.

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P016**

0.03 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P009 through P016, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P009 through P016, combined, shall not exceed 9,175,400 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
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1	800,000
1-2	1,600,000
1-3	2,400,000
1-4	3,200,000
1-5	4,000,000
1-6	4,587,700
1-6	4,587,700
1-7	5,352,317
1-8	6,116,933
1-9	6,881,550
1-10	7,646,167
1-11	8,410,783
1-12	9,175,400

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the

Emissions Unit ID: **P016**

emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P009 through P016, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;

- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: **P016**

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P009 through P016, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P009 through P016, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P009 through P016, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.7 lbs OC emissions/hr
0.007 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.03 TPY PM/PM10 emissions, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P009 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summations of the emissions from emissions units P009 through P016.

3. Emissions Limitation

3.67 TPY OC emissions based on a rolling, 12-month summation, emissions units P009 through P016, combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 de minimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks de minimis emissions units.

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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>
P017 - Dispersions Dept. 20 hp Disperser D412 with fabric filter	OAC rule 3745-31-05(A)(3)	1.8 lbs OC emissions/hr 0.005 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	4.27 TPY OC emissions based on a rolling, 12-month summation,

emissions units P017 and P018 combined.

0.01 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P017 and P018, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 de minimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks de minimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P017 and P018, combined, shall not exceed 4,065,420 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Flint I
PTI A
Issued: 9/23/2004

Emissions Unit ID: **P017**

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
1	400,000
1-2	800,000
1-3	1,200,000
1-4	1,600,000
1-5	2,000,000
1-6	2,032,710
1-7	2,371,495
1-8	2,710,280
1-9	3,049,065
1-10	3,387,850
1-11	3,726,635
1-12	4,065,420

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be

calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P017 and P018, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;

Emissions Unit ID: **P017**

- c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: P017

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P017 and P018, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P017 and P018, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P017 and P018, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.8 lbs OC emissions/hr
0.005 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Term C.1.

2. Emissions Limitation

0.01 TPY PM/PM10 emissions, emissions units P017 and P018, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P017 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P018.

3. Emissions Limitation

4.27 TPY OC emissions based on a rolling, 12-month summation, emissions units P017 and P018 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P017**

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P018 - Dispersions Dept. 20 hp Disperser D413 with fabric filter	OAC rule 3745-31-05(A)(3)	1.8 lbs OC emissions/hr 0.005 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	4.27 TPY OC emissions based on a rolling, 12-month summation, emissions units P017 and P018 combined.

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P018**

0.01 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P017 and P018, combined. See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P017 and P018, combined, shall not exceed 4,065,420 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
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1	400,000
1-2	800,000
1-3	1,200,000
1-4	1,600,000
1-5	2,000,000
1-6	2,032,710
1-7	2,371,495
1-8	2,710,280
1-9	3,049,065
1-10	3,387,850
1-11	3,726,635
1-12	4,065,420

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P017 and P018, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;

- b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
- a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
 - e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
 - f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;

Flint Ink Corp

PTI Application: 14-05560

Issued

Facility ID: 1483060398

Emissions Unit ID: P018

- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023,

combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P017 and P018, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and PM/PM10 emissions limit occurred for emissions units P017 and P018, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P017 and P018, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.8 lbs OC emissions/hr
0.005 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Term C.1.

2. Emissions Limitation

0.01 TPY PM/PM10 emissions, emissions units P017 and P018, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P017 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P018.

3. Emissions Limitation

4.27 TPY OC emissions based on a rolling, 12-month summation, emissions units P017 and P018 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P019 - Milling Dept. HM-10 Mill/Blender G406 with fabric filter	OAC rule 3745-31-05(A)(3)	1.4 lbs OC emissions/hr 0.0002 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	4.78 TPY OC emissions based on a rolling, 12-month summation, emissions units P019 and P020 combined.

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P019**

0.001 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P019 and P020, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P019 and P020, combined, shall not exceed 579,120 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
--------------	---

1	50,000
1-2	100,000
1-3	150,000
1-4	200,000
1-5	250,000
1-6	289,560
1-7	337,820
1-8	386,080
1-9	434,340
1-10	482,600
1-11	530,860
1-12	579,120

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P019**

multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P019 and P020, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;

- b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
- a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
 - e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
 - f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;

235

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P019**

- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: P019

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P019 and P020, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC PM/PM10 emissions limit occurred for emissions units P019 and P020, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P019 and P020, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.4 lbs OC emissions/hr
0.0002 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.001 TPY PM/PM10 emissions, emissions units P019 and P020, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P019 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P020.

3. Emissions Limitation

4.78 TPY OC emissions based on a rolling, 12-month summation, emissions units P019 and P020 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping in term C.2.

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P019**

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P020****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>
P020 - Milling Dept. HM-10 Mill/Blender G407 with fabric filter	OAC rule 3745-31-05(A)(3)	1.4 lbs OC emissions/hr 0.0002 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	4.78 TPY OC emissions based on a rolling, 12-month summation, emissions units P019 and P020

combined.

0.001 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P019 and P020, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P019 and P020, combined, shall not exceed 579,120 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Maximum Allowable Cumulative

<u>Month</u>	<u>Coating and Ink Production (pounds)</u>
1	50,000
1-2	100,000
1-3	150,000
1-4	200,000
1-5	250,000
1-6	289,560
1-7	337,820
1-8	386,080
1-9	434,340
1-10	482,600
1-11	530,860
1-12	579,120

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the

emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P019 and P020, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;

Emissions Unit ID: **P020**

- b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
- a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
 - e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
 - f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;

- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: P020

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P019 and P020, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC PM/PM10 emissions limit occurred for emissions units P019 and P020, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P019 and P020, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.4 lbs OC emissions/hr
0.0002 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.001 TPY PM/PM10 emissions, emissions units P019 and P020, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P019 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P020.

3. Emissions Limitation

4.78 TPY OC emissions based on a rolling, 12-month summation, emissions units P019 and P020 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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>
P021 - Milling Dept. HM-20 Mill/Blender G409 with fabric filter	OAC rule 3745-31-05(A)(3)	1.5 lbs OC emissions/hr 0.0004 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	7.31 TPY OC emissions based on a rolling, 12-month summation, emissions units P021 and P022 combined.

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P021**

0.002 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P021 and P022, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P021 and P022, combined, shall not exceed 1,950,350 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

Maximum Allowable Cumulative

Flint Ink Corp
PTI Application: 14-05560
Issued

Facility ID: 1483060398

Emissions Unit ID: **P021**

<u>Month</u>	<u>Coating and Ink Production (pounds)</u>
1	170,000
1-2	340,000
1-3	510,000
1-4	680,000
1-5	850,000
1-6	975,175
1-7	1,137,704
1-8	1,300,233
1-9	1,462,763
1-10	1,625,292
1-11	1,787,821
1-12	1,950,350

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then

multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P021 and P022, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;

- b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
- a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
 - e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
 - f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;

Flint Ink Corp

PTI Application: 14-05560

Issued

Facility ID: 1483060398

Emissions Unit ID: **P021**

- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
 - i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
 - j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
 - k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
- * 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.
4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.
- * 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.
5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Emissions Unit ID: **P021**

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 3236 P001 through P023, combined

MAGLC ($\mu\text{g}/\text{m}^3$): 4476

Physical changes to or in the method of operation of the emissions units 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
- c. physical changes to the emissions units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P021 and P022, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and/or PM/PM10 emissions limit occurred for emissions units P021 and P022, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P021 and P022, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.5 lbs OC emissions/hr
0.0004 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Term C.1.

2. Emissions Limitation

0.002 TPY PM/PM10 emissions, emissions units P021 and P022, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P021 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P022.

3. Emissions Limitation

7.31 TPY OC emissions based on a rolling, 12-month summation, emissions units P021 and P022 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping in term C.2.

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P021**

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P022 - Milling Dept. HM-20 Mill/Blender G408 with fabric filter	OAC rule 3745-31-05(A)(3)	1.5 lbs OC emissions/hr 0.0004 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	7.31 TPY OC emissions based on a rolling, 12-month summation, emissions units P021 and P022 combined.

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P022**

0.002 TPY PM/PM10 emissions, based on a rolling, 12-month summation, emissions units P021 and P022, combined.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions units P021 and P022, combined, shall not exceed 1,950,350 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
--------------	---

1	170,000
1-2	340,000
1-3	510,000
1-4	680,000
1-5	850,000
1-6	975,175
1-7	1,137,704
1-8	1,300,233
1-9	1,462,763
1-10	1,625,292
1-11	1,787,821
1-12	1,950,350

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P022**

multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions units P021 and P022, combined:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;

- b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
 - e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
 - f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;

274

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P022**

- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

Emissions Unit ID: P022

6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions units P021 and P022, combined. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and/or PM/PM10 emissions limit occurred for emissions units P021 and P022, combined. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions units P021 and P022, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.5 lbs OC emissions/hr
 0.0004 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Term C.1.

2. Emissions Limitation

0.002 TPY PM/PM10 emissions, emissions units P021 and P022, combined

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions from emissions unit P021 as calculated in Term C.1.e., divided by Ton/2000 lbs and then added to the annual summation of the emissions from emissions unit P022.

3. Emissions Limitation

7.31 TPY OC emissions based on a rolling, 12-month summation, emissions units P021 and P022 combined

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: P023

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>
P023 - Milling Dept. HM-40 Mill/Blender G403 with fabric filter	OAC rule 3745-31-05(A)(3)	1.5 lbs OC emissions/hr 0.0007 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	3.81 TPY OC emissions based on a rolling, 12-month summation.

0.002 TPY PM/PM10 emissions
 based on a rolling, 12-month
 summation.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions unit P023 shall not exceed 1,814,880 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production(pounds)</u>
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Flint I
PTI A
Issued: 9/23/2004

Emissions Unit ID: **P023**

1	150,000
1-2	300,000
1-3	450,000
1-4	600,000
1-5	750,000
1-6	907,440
1-7	1,058,680
1-8	1,209,920
1-9	1,361,160
1-10	1,512,400
1-11	1,663,640
1-12	1,814,880

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions P023:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;

Emissions Unit ID: **P023**

- c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
- a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
 - e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
 - f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
 - g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);
 - h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons

287

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P023**

per month (d. multiplied by f.);

- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.
6. The permit to install for emissions units P001 through P023, combined, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the

Flint Ink Corp

PTI Application: 14-05560

Issued

Facility ID: 1483060398

Emissions Unit ID: **P023**

emissions units' exhaust systems, 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 these emissions units 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: ethyl alcohol (*highest emission rate)

TLV (ug/m³):1,880,000

Maximum Hourly Emission Rate (lbs/hr): 221.7, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32765, P001 through P023, combined

MAGLC (ug/m³): 44762

Pollutant: dibutyl phthalate (*lowest TLV)

TLV (ug/m³):5,000

Maximum Hourly Emission Rate (lbs/hr): 3.8 EE -6, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.00077, P001 through P023, combined

MAGLC (ug/m³): 119

Pollutant: toluene (HAP)

TLV (ug/m³):188,000

Maximum Hourly Emission Rate (lbs/hr): 25.23, P001 through P023, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3236 P001 through P023, combined

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County

Emissions Unit ID: **P023**

Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions unit P023. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and/or PM/PM10 emissions limit occurred for emissions unit P023. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions unit P023. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

1.5 lbs OC emissions/hr
 0.0007 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated

by the methods outlined in Term C.1, respectively.

2. Emissions Limitation

0.002 TPY PM/PM10 emissions

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions as calculated in Term C.1.f., divided by Ton/2000 lbs.

3. Emissions Limitation

3.81 TPY OC emissions based on a rolling, 12-month summation

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as

such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1. shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.
2. 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 14-04620 as issued on April 21,1999 and modified on December 8, 1999.

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P026****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>
P026 - Portable Mixing Vessel Washing Area W434	OAC rule 3745-31-05(A)(3)	0.6 lb OC emissions/hr 2.63 TPY OC emissions
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
		See T&C A.2.c.
	OAC rule 3745-31-05(C)	See T&C A.2.a

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with

these limits.

- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the hourly and annual emissions limitations.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of each cleaning solvent used;
 - b. the amount of solvent used, in pounds; and
 - c. the actual OC emissions rate, in pounds OC emissions per month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application;
2. The permittee shall collect and record the following information each month for emissions unit P026:
 - a. the name and identification number of each cleaning solvent that contains Hazardous Air Pollutants (HAPs);
 - b. for each cleaning solvent that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each cleaning solvent that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. the permittee shall calculate the individual and total HAPs emissions from emissions unit P026 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
 - e. the updated rolling, 12-month summation for each individual HAP emissions, in tons per

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P026**

rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.; and

- f. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.

* 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the cumulative HAPs emissions during the first 12 calendar months of operation and the rolling, 12-month HAPs emissions limitations after the first 12 calendar months of operation. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions unit P026. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitation

0.6 lb OC emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr emissions limitation shall be demonstrated by the methods outlined in Term C.1.

2. Emissions Limitation

2.63 TPY OC emissions

Applicable Compliance Method

Compliance with the TPY OC emissions limitation shall be demonstrated by an annual summation of the monthly OC emissions as calculated in Term C.1.c., divided by Ton/2000 lbs.

3. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 de minimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks de minimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, D and E.
2. 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 14-04620 as issued on April 21, 1999 and modified on December 8, 1999.

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>
P027 - Paste Dept. 25 hp Paste Ink Mixer/Mill 1	OAC rule 3745-31-05(A)(3)	0.3 lb OC emissions/hr 1.31 TPY OC emissions See T&C A.2.c. 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 T&C A.2.a.

2. Additional Terms and Conditions

- 2.a The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b The hourly emission limitations outlined are based upon the emissions unit’s Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of tight-fitting covers and compliance with the hourly, and annual emissions limitations.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solvent used, in pounds; and
 - c. the actual OC emissions rate, in pounds OC emissions per month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
 - e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;

- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
 - i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
 - j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
 - k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
- * 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 permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.
- * 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.
4. The permit to install for emissions units P027 through P036 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units using data from the permit to install application

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P027**

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: MEK (CAS 78-93-3)

TLV (ug/m³):589800

Maximum Hourly Emission Rate (lbs/hr): 3.0, P027 through P036, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 130, P027 through P036, combined

MAGLC (ug/m³): 14053

Physical changes to or in the method of operation of the emissions units 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 units 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

308

Flint Ink Corp

PTI Application: 14-05560

Issued

Facility ID: 1483060398

Emissions Unit ID: **P027**

to the change.

The permittee shall collect, record, and retain the following information when it conducts 5evaluations to determine that the changed emissions units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions unit P027. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitation

0.3 lb OC emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr emissions limitation shall be demonstrated by the methods outlined in Term C.1.c.

2. Emissions Limitation

1.31 TPY OC emissions

Applicable Compliance Method

310

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P027**

Compliance with the TPY OC emissions limitation shall be demonstrated by an annual summation of the monthly OC emissions as calculated in Term C.1.c., divided by Ton/2000 lbs.

3. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 de minimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks de minimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

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>
P028 - Paste Dept. 25 hp Paste Ink Mixer/Mill 2	OAC rule 3745-31-05(A)(3)	0.3 lb OC emissions/hr 1.31 TPY OC emissions See T&C A.2.c. 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 T&C A.2.a.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with

these limits.

- 2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of tight-fitting covers and compliance with the hourly and annual emissions limitations.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solvent used, in pounds; and
 - c. the actual OC emissions rate, in pounds OC emissions per month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
 - e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;

- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);

- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);
 - i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
 - j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
 - k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
- * 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 permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.
- * 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.
4. The permit to install for emissions units P027 through P036 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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 these emissions units using data from the permit to install application

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P028**

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: MEK (CAS 78-93-3)

TLV (ug/m³):589800

Maximum Hourly Emission Rate (lbs/hr): 3.0, P027 through P036, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 130, P027 through P036, combined

MAGLC (ug/m³): 14053

Physical changes to or in the method of operation of the emissions units 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 units 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

318

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P028**

to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions units will satisfy the Air Toxic Policy:"

Emissions Unit ID: **P028**

- 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions unit P028. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitation

0.3 lb OC emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr emissions limitation shall be demonstrated by the methods outlined in Term C.1.

2. Emissions Limitation

1.31 TPY OC emissions

Applicable Compliance Method

Compliance with the TPY OC emissions limitation shall be demonstrated by an annual summation

320

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P028**

of the monthly OC emissions as calculated in Term C.1.c., divided by Ton/2000 lbs.

3. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 de minimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks de minimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

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>
P029 - Dispersions Dept. 4 hp Specialty Product Mixer 1 with fabric filter	OAC rule 3745-31-05(A)(3)	0.3 lb OC emissions/hr 0.0004 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	0.47 TPY OC emissions based on a rolling, 12-month summation.

0.001 TPY PM/PM10 emissions based on a rolling, 12-month summation.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit’s Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

- 1. The maximum annual coatings and inks production rate for emissions unit P029 shall not exceed 584,000 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
1	50,000

1-2	100,000
1-3	150,000
1-4	200,000
1-5	250,000
1-6	292,000
1-7	340,667
1-8	389,333
1-9	438,000
1-10	486,667
1-11	535,333
1-12	584,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions unit P029:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink

produced, in pounds;

- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);
- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);

- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.
6. The permit to install for emissions units P027 through P036 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions

328

Flint Ink Corp

PTI Application: 14-05560

Issued

Facility ID: 1483060398

Emissions Unit ID: **P029**

units' exhaust systems, 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 these emissions units 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: MEK (CAS 78-93-3)

TLV (ug/m³):589800

Maximum Hourly Emission Rate (lbs/hr): 3.0, P027 through P036, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 130, P027 through P036, combined

MAGLC (ug/m³): 14053

Physical changes to or in the method of operation of the emissions units 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 units or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

330

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P029**

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)(i)], 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions unit P029. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and/or PM/PM10 emissions limit occurred for emissions unit P029. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the

Emissions Unit ID: **P029**

pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions unit P029. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

0.3 lb OC emissions/hr
0.0004 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.001 TPY PM/PM10 emissions

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions as calculated in Term C.1.e., divided by Ton/2000 lbs.

3. Emissions Limitation

0.47 TPY OC emissions based on a rolling, 12-month summation

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P030 - Dispersions Dept. 4 hp Specialty Product Mixer 2 with fabric filter	OAC rule 3745-31-05(A)(3)	0.3 lbs OC emissions/hr 0.0004 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	0.47 TPY OC emissions based on a rolling, 12-month summation. 0.001 TPY PM/PM10 emissions

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P030**

based on a rolling, 12-month summation.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions unit P030 shall not exceed 584,000 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
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1	50,000
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Flint I
PTI A
Issued: 9/23/2004

Emissions Unit ID: **P030**

1-2	100,000
1-3	150,000
1-4	200,000
1-5	250,000
1-6	292,000
1-7	340,667
1-8	389,333
1-9	438,000
1-10	486,667
1-11	535,333
1-12	584,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

Emissions Unit ID: P030

2. The permittee shall maintain monthly records of the following information for emissions unit P030:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;

- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);
- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);

Emissions Unit ID: P030

- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.
6. The permit to install for emissions units P027 through P036 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, as specified by the permittee in the permit to install application. The Ohio

340

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P030**

EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was

applied for each pollutant emitted by these emissions units 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: MEK (CAS 78-93-3)

TLV (ug/m³):589800

Maximum Hourly Emission Rate (lbs/hr): 3.0, P027 through P036, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 130, P027 through P036, combined

MAGLC (ug/m³): 14053

Physical changes to or in the method of operation of the emissions units 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 units or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

342

Flint Ink Corp

PTI Application: 14-05560

Issued

Facility ID: 1483060398

Emissions Unit ID: **P030**

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)(i)], 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions unit P030. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and/or PM/PM10 emissions limit occurred for emissions unit P030. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the

pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions unit P030. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

0.3 lb OC emissions/hr
0.0004 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.001 TPY PM/PM10 emissions

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions as calculated in Term C.1.e., divided by Ton/2000 lbs.

3. Emissions Limitation

0.47 TPY OC emissions based on a rolling, 12-month summation

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: P031

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>
P031 - Dispersions Dept. 4 hp Specialty Product Mixer 3 with fabric filter	OAC rule 3745-31-05(A)(3)	0.3 lbs OC emissions/hr 0.0004 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	0.47 TPY OC emissions based on a rolling, 12-month summation.

0.001 TPY PM/PM10 emissions
 based on a rolling, 12-month
 summation.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions unit P031 shall not exceed 584,000 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
--------------	---

1	50,000
1-2	100,000
1-3	150,000
1-4	200,000
1-5	250,000
1-6	292,000
1-7	340,667
1-8	389,333
1-9	438,000
1-10	486,667
1-11	535,333
1-12	584,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions unit P031:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink

produced, in pounds;

- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);
- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);

- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.
6. The permit to install for emissions units P027 through P036 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions

352

Flint Ink Corp

PTI Application: 14-05560

Issued

Facility ID: 1483060398

Emissions Unit ID: **P031**

units' exhaust systems, 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 these emissions units 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: MEK (CAS 78-93-3)

TLV ($\mu\text{g}/\text{m}^3$): 589800

Maximum Hourly Emission Rate (lbs/hr): 3.0, P027 through P036, combined

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 130, P027 through P036, combined

MAGLC ($\mu\text{g}/\text{m}^3$): 14053

Physical changes to or in the method of operation of the emissions units 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
- c. physical changes to the emissions units or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

354

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P031**

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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions unit P031. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and/or PM/PM10 emissions limit occurred for emissions unit P031. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the

Emissions Unit ID: **P031**

pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions unit P031. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

0.3 lb OC emissions/hr
0.0004 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.001 TPY PM/PM10 emissions

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions as calculated in Term C.1.e., divided by Ton/2000 lbs.

3. Emissions Limitation

0.47 TPY OC emissions based on a rolling, 12-month summation

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: P032

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>
P032 - Dispersions Dept. 4 hp Specialty Product Mixer 4 with fabric filter	OAC rule 3745-31-05(A)(3)	0.3 lbs OC emissions/hr 0.0004 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	0.47 TPY OC emissions based on a rolling, 12-month summation.

0.001 TPY PM/PM10 emissions
 based on a rolling, 12-month
 summation.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions unit P032 shall not exceed 584,000 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
1	50,000

Flint I
PTI A
Issued: 9/23/2004

Emissions Unit ID: **P032**

1-2	100,000
1-3	150,000
1-4	200,000
1-5	250,000
1-6	292,000
1-7	340,667
1-8	389,333
1-9	438,000
1-10	486,667
1-11	535,333
1-12	584,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

Emissions Unit ID: P032

2. The permittee shall maintain monthly records of the following information for emissions unit P032:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;

- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);
- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);

- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.
6. The permit to install for emissions units P027 through P036 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P032**

units' exhaust systems, 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 these emissions units 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: MEK (CAS 78-93-3)

TLV (ug/m³):589800

Maximum Hourly Emission Rate (lbs/hr): 3.0, P027 through P036, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 130, P027 through P036, combined

MAGLC (ug/m³): 14053

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions unit P032. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and/or PM/PM10 emissions limit occurred for emissions unit P032. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P032**

3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P032**

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions unit P032. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

0.3 lb OC emissions/hr

0.0004 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.001 TPY PM/PM10 emissions

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions as calculated in Term C.1.e., divided by Ton/2000 lbs.

3. Emissions Limitation

0.47 TPY OC emissions based on a rolling, 12-month summation

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026,

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P032**

P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 de minimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks de minimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.**

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P033 - Dispersions Dept. 4 hp Specialty Product Mixer 5 with fabric filter	OAC rule 3745-31-05(A)(3)	0.3 lbs OC emissions/hr 0.0004 lbs PM/PM10 emissions/hr 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(C). See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	0.47 TPY OC emissions based on a rolling, 12-month summation. 0.001 TPY PM/PM10 emissions

Flint I
PTI A
Issued: 9/23/2004

Emissions Unit ID: **P033**

based on a rolling, 12-month summation.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions unit P033 shall not exceed 584,000 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
1	50,000

1-2	100,000
1-3	150,000
1-4	200,000
1-5	250,000
1-6	292,000
1-7	340,667
1-8	389,333
1-9	438,000
1-10	486,667
1-11	535,333
1-12	584,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).
2. The permittee shall maintain monthly records of the following information for emissions unit

P033:

- a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
- a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;

- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);
- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);

- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.
6. The permit to install for emissions units P027 through P036 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions

376

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P033**

units' exhaust systems, 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 these emissions units 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: MEK (CAS 78-93-3)

TLV (ug/m³):589800

Maximum Hourly Emission Rate (lbs/hr): 3.0, P027 through P036, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 130, P027 through P036, combined

MAGLC (ug/m³): 14053

Physical changes to or in the method of operation of the emissions units 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 units 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,

Emissions Unit ID: **P033**

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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions unit P033. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and/or PM/PM10 emissions limit occurred for emissions unit P033. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P033**

County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively)

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P033**

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions unit P033. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

0.3 lb OC emissions/hr

0.0004 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.001 TPY PM/PM10 emissions

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions as calculated in Term C.1.e., divided by Ton/2000 lbs.

3. Emissions Limitation

0.47 TPY OC emissions based on a rolling, 12-month summation

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026,

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P033**

P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 de minimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks de minimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, 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>
P034 - Dispersions Dept. 4 hp Specialty Product Mixer 6 with fabric filter	OAC rule 3745-31-05(A)(3)	0.3 lbs OC emissions/hr 0.0004 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	0.47 TPY OC emissions based on a rolling, 12-month summation.

0.001 TPY PM/PM10 emissions
 based on a rolling, 12-month
 summation.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions unit P034 shall not exceed 584,000 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
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Flint I
PTI A
Issued: 9/23/2004

Emissions Unit ID: **P034**

1	50,000
1-2	100,000
1-3	150,000
1-4	200,000
1-5	250,000
1-6	292,000
1-7	340,667
1-8	389,333
1-9	438,000
1-10	486,667
1-11	535,333
1-12	584,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions unit P034:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P034**

produced, in pounds;

- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);
- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);

- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.
6. The permit to install for emissions units P027 through P036 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P034**

units' exhaust systems, 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 these emissions units 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: MEK (CAS 78-93-3)

TLV (ug/m³):589800

Maximum Hourly Emission Rate (lbs/hr): 3.0, P027 through P036, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 130, P027 through P036, combined

MAGLC (ug/m³): 14053

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions unit P034. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and/or PM/PM10 emissions limit occurred for emissions unit P034. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P034**

3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P034**

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions unit P034. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

0.3 lb OC emissions/hr

0.0004 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.001 TPY PM/PM10 emissions

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions as calculated in Term C.1.e., divided by Ton/2000 lbs.

3. Emissions Limitation

0.47 TPY OC emissions based on a rolling, 12-month summation

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026,

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P034**

P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 de minimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks de minimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.**

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P035 - Dispersions Dept. 3 hp Disperser with fabric filter	OAC rule 3745-31-05(A)(3)	0.5 lbs OC emissions/hr 0.001 lbs PM/PM10 emissions/hr
		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(C).
		See T&C A.2.c.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	0.65 TPY OC emissions based on a rolling, 12-month summation.
		0.002 TPY PM/PM10 emissions,

Flint I**PTI A****Issued: 9/23/2004**Emissions Unit ID: **P035**

based on a rolling, 12-month summation.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

1. The maximum annual coatings and inks production rate for emissions unit P035 shall not exceed 620,500 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
1	55,000
1-2	110,000

1-3	165,000
1-4	220,000
1-5	275,000
1-6	310,250
1-7	361,958
1-8	413,667
1-9	465,375
1-10	517,083
1-11	568,792
1-12	620,500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).
2. The permittee shall maintain monthly records of the following information for emissions unit P035:

- a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
- a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;
 - d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;

- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);
- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);

Emissions Unit ID: P035

- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.
6. The permit to install for emissions units P027 through P036 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, as specified by the permittee in the permit to install application. The Ohio

400

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P035**

EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: MEK (CAS 78-93-3)

TLV (ug/m³):589800

Maximum Hourly Emission Rate (lbs/hr): 3.0, P027 through P036, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 130, P027 through P036, combined

MAGLC (ug/m³): 14053

Physical changes to or in the method of operation of the emissions units 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 units 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,

Emissions Unit ID: P035

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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions unit P035. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and/or PM/PM10 emissions limit occurred for emissions unit P035. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton

403

Flint I

PTI A

Issued: 9/23/2004

Emissions Unit ID: **P035**

County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

Emissions Unit ID: **P035**

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions unit P035. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

0.5 lbs OC emissions/hr
 0.001 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.002 TPY PM/PM10 emissions

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions as calculated in Term C.1.e., divided by Ton/2000 lbs.

3. Emissions Limitation

0.65 TPY OC emissions based on a rolling, 12-month summation

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005,

T006, T007, 6,000 gallon cleaning solvent storage tank T-108 de minimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks de minimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, 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>
P036 - Dispersions Dept. 3 hp Disperser with fabric filter	OAC rule 3745-31-05(A)(3)	0.5 lbs OC emissions/hr 0.001 lbs PM/PM10 emissions/hr 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(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	0.65 TPY OC emissions based on a rolling, 12-month summation.

0.002 TPY PM/PM10 emissions
based on a rolling, 12-month
summation.

See T&Cs A.2.a. and B.1.

2. Additional Terms and Conditions

- 2.a** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units, 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.
- 2.b** The hourly emission limitations outlined are based upon the emissions unit’s Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** 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 during dry materials additions, compliance with the hourly, TPY, and rolling, 12-month emissions limitations and compliance with the rolling, 12-month production limitation.

B. Operational Restrictions

- 1. The maximum annual coatings and inks production rate for emissions unit P036 shall not exceed 620,500 pounds per year, based upon a rolling, 12-month summation of the coatings and inks production rate.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating and Ink Production (pounds)</u>
--------------	---

1	55,000
1-2	110,000
1-3	165,000
1-4	220,000
1-5	275,000
1-6	310,250
1-7	361,958
1-8	413,667
1-9	465,375
1-10	517,083
1-11	568,792
1-12	620,500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the coatings and inks production rate.

2. The pressure drop across the fabric filter shall be maintained within the range of 2 to 5 inches of water while the emissions units are in operation based on the manufacturer's current written recommendation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification of the product(s) manufactured or used;
 - b. the amount of solids used, in pounds;
 - c. the amount of solvent used, in pounds;
 - d. the actual OC emissions rate, in pounds OC emissions per month using the calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - e. the actual PM/PM10 emissions rate, in pounds PM/PM10 emissions per month shall be calculated by dividing the amount of solids used in b. by 2000 and multiplying by the emission factor in Table 6.7-1, AP-42, Fifth Edition (2 lb PM/PM10/ton solids) then multiplying by (1- control efficiency).

2. The permittee shall maintain monthly records of the following information for emissions unit P036:
 - a. during the first 12 calendar months following the issuance of this permit, the cumulative coatings and inks production rate, in pounds, for each month. This shall be a cumulative total of all months since the commencement of operations;
 - b. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the coatings and inks production rate, in pounds. This shall include the information for the current month and the preceding eleven months;
 - c. during the first 12 calendar months following the issuance of this permit, the actual OC emissions, in tons, for each month. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application; and
 - d. beginning after the first 12 calendar months following the issuance of this permit, the updated rolling, 12-month summation of the actual OC emissions, in tons per rolling, 12-month period, for each month. This shall include the information for the current month and the preceding eleven months. The permittee shall use calculation methods based on the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.
3. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036, combined:
 - a. the name and identification number of each coating and ink produced that contains Hazardous Air Pollutants (HAPs);
 - b. for each coating and ink produced that contains HAPs, the individual HAP content, in percent (%) by weight;
 - c. for each coating and ink produced that contains HAPs, the total HAP content, in percent (%) by weight;

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P036**

- d. for each coating and ink produced that contains HAPs, the amount of each coating and ink produced, in pounds;
- e. for each coating and ink produced that contains HAPs, the individual HAPs emissions factor, in lbs HAP emitted/lb product produced;
- f. for each coating and ink produced that contains HAPs, the total HAPs emissions factor, in lbs HAPs emitted/lb product produced;
- g. the individual HAP emissions for each HAP from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by e.);
- h. the total HAPs emissions from all coatings and inks produced that contain HAPs, in tons per month (d. multiplied by f.);

- i. the updated rolling, 12-month summation for each individual HAP emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in g.;
- j. the updated rolling, 12-month summation for total HAPs emissions, in tons per rolling, 12-month period, for each month. This shall be a summation which will include the information for the current month and the preceding eleven months as calculated in h.; and
- k. as an alternative method, the permittee may calculate the individual and total HAPs emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036 using HAPs content information and the procedures and algorithms published in the USEPA document, "Control of Volatile Organic Compound Emissions from Batch Processes", EPA-450/R-94-020, as outlined in the Permit to Install 14-05560 application.

* 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.

- 4. The permittee shall calculate the individual and total HAPs emissions from emissions units T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 deminimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks deminimis emissions units using HAPs content information and the procedures outlined in AP-42, Fifth Edition, Chapter 7, Organic Liquid Storage Tanks, 1997 and the Tanks 4.0 computer software program.

* 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.

- 5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.
- 6. The permit to install for emissions units P027 through P036 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions

412

Flint Ink Corp

PTI Application: 14-05560

Issued

Facility ID: 1483060398

Emissions Unit ID: **P036**

units' exhaust systems, 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 these emissions units 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: MEK (CAS 78-93-3)

TLV (ug/m³):589800

Maximum Hourly Emission Rate (lbs/hr): 3.0, P027 through P036, combined

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 130, P027 through P036, combined

MAGLC (ug/m³): 14053

Physical changes to or in the method of operation of the emissions units 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 units 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 units 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 units 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 submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coatings and inks production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings and inks production rate levels for emissions unit P036. If exceedances occurred, the permittee shall also note if exceedances of the rolling, 12-month OC and/or PM/PM10 emissions limit occurred for emissions unit P036. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

Flint Ink Corp**PTI Application: 14-05560****Issued****Facility ID: 1483060398**Emissions Unit ID: **P036**

3. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions, in tons per year, from emissions unit P036. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitations

0.5 lbs OC emissions/hr

0.001 lbs PM/PM10 emissions/hr

Applicable Compliance Methods

Compliance with the lbs OC /hr and lbs PM/PM10/hr emissions limitations shall be demonstrated by the methods outlined in Terms C.1.

2. Emissions Limitation

0.002 TPY PM/PM10 emissions

Applicable Compliance Method

Compliance with the TPY PM/PM10 emissions limitation shall be demonstrated by an annual summation of the monthly PM/PM10 emissions as calculated in Term C.1.e., divided by Ton/2000 lbs.

3. Emissions Limitation

0.65 TPY OC emissions based on a rolling, 12-month summation

Applicable Compliance Method

Compliance with the rolling, 12-month OC emissions limitation shall be demonstrated by the methods outlined in Term C.2.

4. Emissions Limitations

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P026,

P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, T001, T002, T003, T004, T005, T006, T007, 6,000 gallon cleaning solvent storage tank T-108 de minimis emissions unit and six 1,500 gallon and four 1,000 gallon interim product storage tanks de minimis emissions units

Applicable Compliance Method

Compliance with the rolling, 12-month HAPs emissions limitations shall be demonstrated by the methods outlined in Terms C.3 and C.4 of emissions units P001 - P023, in Term C.2 of emissions unit P026, in Terms C.2 and C.3 of emissions units P027 and P028 and in Terms C.3 and C.4 of emissions units P029 - P036.

5. Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

6. Compliance with the production limitation in term B.1 shall be demonstrated by the record keeping 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, C.3, C.4, C.5, D and E.