

Facility ID: 1318557928 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1318557928 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
A flexographic conversion line to print, cut, produce, and package printed plastic film / sheeting with 6 color stations and in-line gas-fired dryer. The company identification is Uteco Gold 608 Printing Press.	OAC rule 3745-31-05 (PTI #13-3015)	Volatile Organic Compounds (VOC) content shall not exceed 6.70 pounds of VOC per gallon (excluding water and exempt solvents) of coating or ink, as applied. VOC emissions shall not exceed 22.50 pounds per hour. VOC emissions shall not exceed 98.55 tons per year. NOx emissions shall not exceed 0.045 pound per hour. NOx emissions shall not exceed 0.20 ton per year.
	OAC rule 3745-21-09(Y) 40 CFR 63 Subpart KK	See B.1. See A.2.a.

2. Additional Terms and Conditions

- (a) The permittee chooses to commit to, and meet the following criteria for purposes of establishing the facility to be an area source with respect to 40 CFR part 63 subpart KK:
 - i. Use less than 10 tons per each rolling 12-month period of each hazardous air pollutant (HAP) at the facility, including materials used for source categories or purposes other than printing and publishing; and
 - ii. Use less than 25 tons per each rolling 12-month period of the combination of all HAPs at the facility, including material used for source categories or purposes other than printing and publishing. The permittee may exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or non-contact cooling) or intake air (used either as compressed air or for combustion). The permittee shall comply with any applicable local, State and federal requirements governing the storage, treatment, handling, transport and disposal of any waste materials generated by the operation of this emissions unit.

B. Operational Restrictions

1. The permittee shall be limited to a maximum usage of 148 tons per calendar year of coatings and inks at this facility.
2. The permittee shall burn only natural gas in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating or ink and cleanup material, as applied;

- b. the VOC content of each coating or ink (excluding water and exempt solvents), in pounds per gallon, as applied;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the number of gallons (excluding water and exempt solvents) of each coating or ink, as applied;
 - e. the number of gallons of each cleanup material employed;
 - f. the total VOC emissions from all coatings or inks and cleanup materials employed, in pounds and in tons;
 - g. the total number of hours the emissions unit was in operation;
 - h. the average hourly VOC emission rate for all coatings, inks, and cleanup materials, i.e., (f)/(g), in pounds per hour average; and
 - i. the total coating and ink usage in tons.
- 2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the single HAP content of each coating, ink, and cleanup material, in pounds per gallon;
 - b. the combined HAPs content of each coating, ink, and cleanup material, in pounds per gallon;
 - c. the emissions of each single HAP from all coatings, inks, and cleanup materials employed, in pounds or in tons; and
 - d. the emissions of combined HAPs from all coatings, inks, and cleanup materials employed, in pounds or in tons.
 - 3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the rolling 12-month emissions of each single HAP;
 - b. the rolling 12-month emissions of the combined HAPs; and
 - c. the total weight in tons of coatings and inks employed per calendar year.
 - 4. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) written reports which include the following information:
 - a. identification of each day during which the VOC content of ink exceeded 6.70 pounds per gallon (excluding water and exempt solvents) of coating and/or ink, as applied, and the actual VOC content for each such coating or ink;
 - b. identification of each hour during which the VOC emissions from this emissions unit exceeded 22.50 pounds per hour, and the actual VOC emissions for each such hour;
 - c. identification of each rolling 12-month period during which any single HAP emissions from this emissions unit exceeded 10 tons, and the actual single HAP emissions for each such rolling 12-month period; and
 - d. identification of each rolling 12-month period during which the combined HAP emissions from this emissions unit exceeded 25 tons, and the actual combined HAP emissions for each such rolling 12-month period.
- 2. All deviation (excursion) written reports except the fuel usage (see Section D.3) shall be submitted in accordance with Section 3.b of the General Terms and Conditions.
- 3. The permittee shall submit deviation (excursion) written reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the occurrence of the deviation to the Director (the appropriate Ohio EPA District Office or local air agency).
- 4. The permittee shall submit annual written reports which summarize the total VOC emissions generated by this emissions unit, the total coating or ink usage, and the total cleanup material usage for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year to the Director (the appropriate Ohio EPA District Office or local air agency).
- 5. The permittee shall also submit annual written reports which summarize the total emissions of each single HAP and combined HAPs generated by this emissions unit for the previous calendar year. The reports shall include the emission calculations, shall be submitted by January 31 of each year to the Director (the appropriate Ohio EPA District Office or local air agency).

E. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - Emission Limitation: 6.70 pounds VOC per gallon (excluding water and exempt solvents) of coating or ink, as applied
Applicable Compliance Method: Monitoring and record keeping requirements pursuant to Section C.
 - Emission Limitation: 22.50 pounds VOC per hour of operation
Applicable Compliance Method: Monitoring and record keeping requirements pursuant to Section C.
 - Emission Limitation: 98.55 tons VOC per year
Applicable Compliance Method: Monitoring and record keeping requirements pursuant to Section C.
 - Emission Limitation: 0.045 pound NOx per hour

Applicable Compliance Method:

Actual Emissions, NOx = (Heat X Emission Factor)/Heating Value = pounds/hour

* Heat = Heat input of dryer burner, 300,000 BTU/hr

* Emission Factor = 100 pounds NOx per million cubic feet natural gas

* Heating Value = 1,000 BTU per cubic foot natural gas

Actual Emissions, NOx = (300,000 X 100/1,000,000)/1,000 = 0.03 pound/hour

Emission Limitation: 0.20 ton NOx per year

Applicable Compliance Method: The emissions shall be calculated as the product of the NOx emissions per hour and the actual number of hours of operation in a year.

2. OAC rule 3745-21-10 (B), U.S. EPA reference Method 24 (for coatings) and/or Method 24A (for flexographic and rotogravure printing inks and related coatings), 40 CFR 60, Appendix A, shall be used to determine the organic compound content of the coating or ink. The test shall be conducted at the maximum printing speed and maximum coverage of substrate being printed.
3. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: less than 10 ton per each rolling 12-month period of each HAP at the facility

Applicable Compliance Method: Compliance with the above limit shall be determined based upon the recordkeeping requirements specified in section C.3.
 - b. Emission Limitation: less than 25 tons per each rolling 12-month period of the combination of all HAPs at the facility

Applicable Compliance Method: Compliance with the above limit shall be determined based upon the recordkeeping requirements specified in section C.3.
4. Formulation data shall be used to determine the HAP contents of the inks and cleanup materials.

F. **Miscellaneous Requirements**

1. None