

Facility ID: 1409000859 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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: 1409000859 Emissions Unit ID: K004 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>
Flexographic printing press	OAC 3745-31-05 (PTI 14-4199)	See A.2.
	40 CFR Part 60, Subpart KK	Less stringent than the VOC content limits established per OAC 3745-31-05.
	OAC 3745-21-09(Y)(1)(a)	See A.2.b.

2. Additional Terms and Conditions

- (a) The VOC content of each coating and ink employed in this emissions unit shall not exceed 0.44 lb/gallon, as applied, (including water).
 The VOC content of each coating and ink employed in this emissions unit shall not exceed forty percent VOC by volume of the coating or ink, as applied, (excluding water) or twenty-five percent VOC by volume of the volatile matter in the coating or ink.
 The VOC content of each cleanup material employed in this emissions unit shall not exceed 0.78 lb/gallon.
 The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs.
 The VOC emissions from this emissions unit shall not exceed 1.67 lbs/hr and 5.58 TPY (including cleanup).

The hourly VOC emissions limit is based on the emissions unit's PTE. Therefore, no record keeping, reporting or testing is required to demonstrate compliance with this limit.
 The NH3 emissions from this emissions unit shall not exceed 0.2 lb/hr and 0.63 TPY.

The NH3 emissions limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions units' exhaust systems, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for NH3 based on the SCREEN3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling:

Pollutant: NH3

TLV (ug/m3):17,000
 Maximum Hourly Emission Rate (lbs/hr): 2.45
 Predicted 1 Hour Maximum Ground-Level Concentration at 87 meters (ug/m3): 215
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 405

B. Operational Restrictions

1. The total amount of coatings and inks employed in this emissions unit shall not exceed 25,000 gallons per year (including water).
2. The amount of organic cleanup materials employed in this emissions unit shall not exceed 200 gallons per year.
3. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to the Hamilton County Department of Environmental Services is required, including the possible issuance of modifications to PTI number 14-4199 and this operating permit:

a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table.

b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.

c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

d. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].

e. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

C. Monitoring and/or Record Keeping Requirements

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

a. The name and identification number of each coating, ink and cleanup material employed.

b. The VOC content of each coating and ink (excluding water and exempt solvents), as applied, in lbs VOC/gallon.

c. The VOC content of each coating and ink (including water and exempt solvents), as applied, in lbs VOC/gallon.

d. The gallons of each coating and ink employed.

e. The gallons of each cleanup material employed.

f. The VOC content of each cleanup material employed, in lbs VOC/gallon.

g. The total gallons of all coatings and inks employed.

h. The total gallons of all cleanup materials employed.

i. The total VOC emissions, i.e., the sum of (c)(d) plus (e)(f) for each coating, ink and cleanup material employed divided by 2000, in tons.

2. The permittee shall collect and record the following information each month for the entire facility:

a. the name and identification number of each coating and ink, as applied;

b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating and ink, in pounds of individual HAP per gallon of coating or ink, as applied;

c. the total combined HAP content of each coating and ink, in pounds of combined HAPs per gallon of coating or ink, as applied (the sum of all the individual HAP contents from (b));

d. the number of gallons of each coating and ink employed;

e. the name and identification of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from (f));

h. the number of gallons of each cleanup material employed.

i. the total individual HAP emissions for each HAP from all coatings, inks and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each coating and ink plus the sum of (f) times (h) for each cleanup material); and

j. the total combined HAP emissions from all coatings, inks and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for each coating and ink plus the sum of (g) times (h) for each cleanup material).

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

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any monthly record which shows the use of noncompliance coatings, inks or cleanup materials (i.e., coatings, inks or cleanup materials exceeding the allowable VOC content limits). A copy of such record shall be sent to the Hamilton County Department of Environmental Services within thirty days following the end of the calendar month.

2. The permittee shall also submit annual reports which specify the following for for the previous calendar year:

a. the total VOC emissions from this emissions unit;

b. the individual HAP emissions from the entire facility;

c. the combined HAP emissions from the entire facility;

d. the total coating usage for this emissions unit; and

e. the total cleanup material usage for this emissions unit.

These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each cleanup material employed.
3. Compliance with the VOC content limits shall be demonstrated by the record keeping requirements outlined in C.1.
4. Compliance with the annual VOC emissions limit shall be demonstrated by the sum of the monthly records in C.1.
5. Compliance with the HAP emissions limits shall be demonstrated by the record keeping requirements outlined in C.2.

F. Miscellaneous Requirements

None