Facility ID: 1409010025 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

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
flexographic printing press EG-43	OAC rule 3745-31-05 (PTI 14-3290)	See section A.2. below.
	OAC rule 3745-21-09(Y)(1)	Less stringent than VOC limitations established pursuant to OAC rule 3745-31-05.

2. **Additional Terms and Conditions**

   (a) The VOC content of each coating employed shall not exceed 0.61 lb/gallon of coating, as applied, excluding water and exempt solvents.
   The VOC emissions shall not exceed the following limitations:

   3.66 lbs/hr* and 3.47 TPY.

   * The daily emission limitation is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limit.
   The VOC content of each coating employed shall not exceed 40% by volume, excluding water and exempt solvents.

B. **Operational Restrictions**

1. Coating usage shall not exceed 6 gallons/hour and 11,368.5 gallons/year.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information on a monthly basis:

   a. The company name and identification number of each coating employed.

   b. The VOC content (excluding water and exempt solvents), in pounds per gallon of coating, for each coating employed.

   c. The VOC content (excluding water and exempt solvents), in percent by volume, for each coating employed.

   d. The number of gallons (excluding water and exempt solvents) of each coating employed.

   e. The number of gallons of each coating employed.

   f. The total VOC emissions in tons {summation of (b x d/2000) for each coating}.

   g. The total number of gallons of coatings employed (summation of e).

   h. The total number of hours of operation.

   i. The average hourly coating usage, in gallons per hour (g/h).

D. **Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) or coating usage exceeding the hourly limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

2. The permittee shall submit annual reports of the annual coating usage and VOC emissions for each calendar year. This report shall be submitted by February 15 of each year and shall cover the previous 12 calendar months (January through December).

E. **Testing Requirements**

1. Compliance with the hourly and annual coating usage limitations, and the annual VOC emission limitation shall be determined by the record keeping requirements in Section C.

2. 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.

3. Compliance with the hourly VOC emission limitation shall be determined by the record keeping requirements in Section C or, if required, by testing using Method 25 or 25A.

F. **Miscellaneous Requirements**

1. None