

Facility ID: 1409010838 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: 1409010838 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>
Flexographic Printing Press #217	OAC rule 3745-31-05 See section F	22.6 LBS Organic Compounds (OC)/HR, 4.5 TPY OC based on a rolling, twelve-month total.
	40 CFR Part 63, Subpart KK See section F	See Term A.2.a See Term D.4
	OAC rule 3745-21-09(Y)(1)(a) See section F	See Term A.2.b

2. **Additional Terms and Conditions**
 - (a) 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. Compliance with the above limitations shall be determined on a rolling, 12-month summation. The VOC content limit based on this applicable rule is less stringent than the emission limits established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

1. The following operational limitations shall apply to emissions unit K001:
 - a. The ink usage shall not exceed 216,600* pounds per year as a rolling, twelve-month total.
 - b. The OC content of inks shall not exceed 3%* by weight as a rolling, twelve-month weighted average.
 - c. The coating usage shall not exceed 66,700* pounds per year as a rolling, twelve-month total.
 - d. The OC content of coatings shall not exceed 3%* by weight as a rolling, twelve-month weighted average.
 - e. The cleanup material usage shall not exceed 3,000* pounds per year as a rolling, twelve-month total.
 - f. The OC content of cleanup material shall not exceed 30%* by weight as a rolling, twelve-month weighted average.

*The usage rate and OC content limitation may be exceeded provided the annual OC emissions limit is not exceeded. However, the following shall not be exceeded at any time:

 - i. The maximum OC content of inks shall not exceed 6% by weight.
 - ii. The maximum OC content of coatings shall not exceed 6.3% by weight.
 - iii. The maximum OC content of the inks and coatings shall not exceed:
 - (a) . forty percent OC by volume of the coating and ink, excluding water; or
 - (b) . twenty-five percent OC by volume of the volatile matter (including water) in the coating and ink.
2. The permittee shall store all spent OC containing cleaning materials and cleaning rags in covered containers.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records which list the following information for emissions unit K001:
 - a. The company identification of each ink, coating and cleanup material.
 - b. The amount of each ink, coating and cleanup material employed, in pounds.
 - c. The OC content of each ink, coating and cleanup material.
 - d. The percent OC by volume of each coating and ink, excluding water.

- e. The percent OC by volume of the volatile matter (including water) of each coating and ink.
 - f. The monthly-weighted average OC content (in percent by wt.) of each ink, coating and cleanup material.
 - g. The monthly OC emissions, in pounds or tons, from this emissions units based on a 7% organic solvent retention for inks and 100% organic solvent evaporation for coatings and cleanup materials.
 - h. The rolling, twelve-month total usage for all inks, coatings and cleanup materials, in pounds per year.
 - i. The rolling, twelve-month weighted average OC content (in percent by wt.) for all inks, coatings and cleanup materials.
 - j. The rolling, twelve-month total OC emissions, in tons per year.
- 2. The permittee shall collect and record the following information each month for all emissions units at the facility:
 - a. The name and identification number of each ink, coating, fountain solution, cleanup material and adhesive.
 - b. The individual HAP content for each HAP of each ink, coating, fountain solution, cleanup material and adhesive, in weight percent of individual HAP.
 - c. The total combined HAP content of each ink, coating, fountain solution, cleanup material and adhesive, in weight percent of combined HAPs (the sum of all the individual HAP contents from (b)).
 - d. The number of pounds of each ink, coating, fountain solution, cleanup material and adhesive employed.
 - e. The total individual HAP emissions for each HAP from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).
 - f. The total combined HAP emissions from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons per month (the sum of (c) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).
 - g. The rolling, twelve-month total individual HAP emissions for each HAP from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons.
 - h. The rolling, twelve-month total combined HAPs from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons.

A listing of the Hazardous Air Pollutants (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. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

D. Reporting Requirements

- 1. The permittee shall submit semi-annual reports which include the following information:
 - a. The rolling, twelve-month total usage for ink, coating and cleanup material, in pounds per year, for each month.
 - b. The rolling, twelve-month weighted average OC content (in percent by wt.) for inks, coatings and cleanup material, for each month.
 - c. The rolling, twelve-month total OC emissions, in tons per year, for each month.

These reports shall be submitted by August 15 and February 15 of each year and shall cover the previous six calendar months (January to June and July to December, respectively).
- 2. The permittee shall notify the Director of any monthly record showing that this emissions unit has exceeded the emission limitations and/or the operational limitations outlined in this permit. A copy of such record shall be sent to the Director within 30 days after the exceedance occurs.
- 3. The permittee shall notify the Director of any exceedance of the HAP emissions limitations set forth in this permit. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. The annual reports also shall specify the single HAP and combined HAP emissions for the previous calendar year. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period, then a report is required stating so.
- 4. The permittee will submit an initial notification for this emissions unit in accordance with 40 CFR 63.830(b)(1) by May 30, 1998.

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. Compliance with the usage and emission limitations outlined in this permit shall be demonstrated by the record keeping requirements outlined in Term C.1 and C.2.

F. Miscellaneous Requirements

- 1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in the permit to install 14-4234 as issued on 5/14/97: A-E.