Facility ID: 1409030956 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: 1409030956 Emissions Unit ID: P026 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P026-40 inch Three Roll Mill M-109	OAC rule 3745-31-05(A)(3) (PTI 14-05415)	0.47 lbs/hr OC 10.0 lbs/day OC 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 terms A.2.a, A.2.b, A.2.d and B.1.
	OAC rule 3745-21-07(G)(2)	Exempt

2. **Additional Terms and Conditions**

   (a) The maximum OC content for the inks produced in this emissions unit shall not exceed 50 percent by weight.
   The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility 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.
   The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.
   The combined annual organic compound (OC) emissions from emissions unit P026 and P027 combined shall not exceed 2.98 TPY, including cleanup based on a rolling, 12-month summation.
   Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation and the HAP and OC emissions limitations.

B. **Operational Restrictions**

1. The maximum annual ink production rate for emissions units P026 and P027 combined shall not exceed 400,000 pounds, based on a rolling, 12-month summation.

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

1. The permittee shall collect and record the following information each month for emissions units P026 and P027 combined:

   a. The name and identification of each batch of ink produced.

   b. The OC content for each ink produced, in percent by weight.

   c. The amount of each ink produced, in pounds.

   d. The rolling, 12-month summation of the ink production figures, in pounds. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative ink production figures for each calendar month.

   e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0075 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83).

   f. The name and identification of each cleanup material combined.

   g. The number of pounds of each cleanup material employed.

h. The number of pounds of each cleanup material recovered for use as make-up solvent or reclaimed as waste for disposal.

i. The OC emissions from all cleaning materials, in pounds or tons (g-h).

j. The total OC emissions from all inks produced and cleanup materials employed, in pounds or tons (e+i).

k. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or 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 ink produced;

b. The individual HAP content for each HAP of each ink in pounds of individual HAP per pound of ink, as produced;

c. The total combined HAP content of each ink in pounds of combined HAPs per pound of ink, as produced [sum all the individual HAP contents from (b)];

d. The number of pounds of each ink produced;

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 pound of cleanup material, as applied;

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

h. The number of pounds of each cleanup material employed;

i. The total individual HAP emissions for each HAP from all inks produced and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) times the emissions factor in C.1.e. for each ink plus the sum of (f) times (h) times (1 - the solvent recovery rate) for each cleanup material];

j. The total combined HAP emissions from all inks produced and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) times the emissions factor in C.1.e. for each ink plus the sum of (g) times (h) times (1 - the solvent recovery rate) for each cleanup material];

k. The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceeding eleven calender months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI; and
l. The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceeding eleven calender months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* 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 notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations set forth in term A.2.b. 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. 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.

2. The permittee shall submit quarterly reports which specify the updated rolling, 12-month summation of total ink production in pounds from emissions units P026 and P027 combined for each calendar month.

3. The permittee shall submit deviation reports which identify all exceedances of the OC content limitations in term A.2.a and the OC emissions limitation in term A.2.d.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Condotions of this permit.

E. **Testing Requirements**

1. Compliance with the percent by weight OC content limit in term A.2.a shall be determined by the record keeping requirements as specified in term C.1.

2. Compliance with the OC emission limitations in this permit shall be determined in accordance with the emission factors provided by AP-42 Table 6.4-1 (5/83) and the record keeping requirements as specified in term C.1.

3. Compliance with the ink production limitation in term B.1 shall be determined by the record keeping requirements as specified in term C.1.

4. Compliance with the HAPs limitations in term A.2.b shall be determined by the record keeping requirements as specified in term C.2.

F. **Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.