

Facility ID: 1409030956 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: 1409030956 Emissions Unit ID: P040 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>
P040-Poly premix tank T-145	OAC rule 3745-31-05(A)(3) 14-05687	Organic compound (OC) emissions shall not exceed 0.9 pound per hour and 21.6 pounds per day. Particulate emissions (PE) shall not exceed 0.01 pound per hour and 0.01 ton per year. Particulate matter 10 microns and less (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-17-07(A)(1). See terms A.2.b, A.2.e. and B.1.
	OAC rule 3745-31-05(C) OAC rule 3745-21-07(G)(2) OAC rule 3745-17-07(A)(1) OAC rule 3745-17-11	See term A.2.c. Exempt See term A.2.a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 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 and the hourly emission limitations for PM-PM10 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 annual organic compounds (OC) emissions from emissions unit P040 shall not exceed 1.80 TPY. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the mass and visible emissions limitations, process throughput limitation and the use of a scrubber with an overall PE control efficiency of 98 percent.

B. Operational Restrictions

1. The maximum annual ink production rate for emissions unit P040 shall not exceed 1,200,000 pounds.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit P040:
 - 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 OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83).
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.d. 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.d. 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 preceding eleven calendar 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 preceding eleven calendar 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.c. 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 an annual report to the Hamilton County Department of Environmental Services which specifies the annual ink production in pounds from emissions unit P040 for each calendar year. These reports shall be submitted by January 31 of each year.
- 3. The permittee shall submit deviation reports which identify all exceedances of the OC content limitations in term A.2.b and the OC emissions limitations in term A.2.e.
- 4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

- 1. Compliance with the emissions limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation:

Visible particulate emissions from this emissions unit shall not exceed twenty per cent opacity as a six-minute average, except as specified by rule

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.
 - b. Emissions Limitations:

0.01 lb/hr PE; 0.01 lb/hr PM10

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum hourly tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1 - 0.98), as provided in Permit to Install application 14-05687 as received on February 23, 2005. PM10 emissions are assumed to be equivalent to the PE emission rate.

c. Emissions Limitations:

0.01 TPY PE; 0.01 TPY PM10

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the limited maximum annual tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1 - 0.98), as provided in Permit to Install application 14-05687 as received on February 23, 2005. PM10 emissions are assumed to be equivalent to the PE emission rate.

d. Emissions Limitations:

0.9 lb/hour OC; 21.6 lb/day OC and 1.80 TPY OC

Applicable Compliance Method

Compliance shall be demonstrated by multiplying an emission factor of 0.3 pound OC/100 pounds of product (AP-42 Table 6.4-1; 5/83) and by the amount of ink produced, as provided in Permit to Install application 14-05687 as received on February 23, 2005.

2. Compliance with the percent by weight (OC content) limitation in term and condition A.2.b shall be demonstrated by the recordkeeping in term and condition C.1.
3. Compliance with the production limitation in term and condition B.1 shall be demonstrated by the recordkeeping in term and condition C.1.
4. Compliance with the HAPs limitations in term A.2.c shall be determined by the record keeping requirements as specified in term C.2.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.