

Facility ID: 1413020453 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: 1413020453 Emissions Unit ID: K008 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>
K008 - Ward 2-Color Rotary Die Cutter	OAC rule 3745-31-05(A)(3) (PTI 14-05799)	Volatile Organic Compounds (VOC) emissions shall not exceed 5.31 pounds per hour. The requirements of this rule also includes compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a) and OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	Volatile Organic Compounds (VOC) emissions shall not exceed 19.89 tons per year, based upon a rolling, 12-month summation.
	OAC rule 3745-21-09(Y)(1)(a)	See term A.2.c and section B.1. See term A.2.b.

2. Additional Terms and Conditions

- (a) The hourly emission limitation(s) outlined are based upon the emission unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit. The VOC content of each coating employed in this emissions unit shall not exceed the following limitations:
 - a. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
 - b. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.

The VOC content of the coatings employed in this emissions unit shall not exceed 8.3% by weight, as applied. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of compliant coatings, VOC content limitations and usage limitations.

B. Operational Restrictions

1. The maximum annual usage rates for emissions unit K008 shall not exceed 479,230 pounds of coating. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the usage limits specified in the following table:

Month(s) Maximum Allowable Cumulative Coating Usage Pounds

- 1 39,936
- 1-2 79,872
- 1-3 119,808
- 1-4 159,743
- 1-5 199,679
- 1-6 239,615
- 1-7 279,551
- 1-8 319,487
- 1-9 359,423

1-10 399,359
 1-11 439,294
 1-12 479,230

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K008:
 - a. The company identification for each coating employed;
 - b. The VOC content of each coating in % by weight VOC, as applied;
 - c. The ammonia content of each coating in percent by weight, as applied;
 - d. The percent VOC by volume of each coating (excluding water and exempt solvents), as applied, or the percent VOC by volume of the volatile matter in the coating;
 - e. The number of pounds of each coating employed;
 - f. The updated rolling, 12-month summation of usage rates for the coatings employed in pounds. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve calendar months of operation following the issuance of the permit, this shall be a cumulative total for all the months since startup of this emissions unit;
 - g. The total combined VOC emissions from all coatings employed, in pounds or tons per month [the sum of (b) times (e) for each coating];
 - h. The updated rolling, 12-month summation for the total combined VOC emissions from all coating employed, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
2. The permit to install for this emissions unit K008 was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ammonia

TLV (ug/m3): 17,410

Maximum Hourly Emission Rate (lbs/hr): 0.51

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 39.51

MAGLC (ug/m3): 415

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or adhesive materials), or the use of new 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 previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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., VOC contents). The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly reports which specify the rolling, 12-month summation of VOC emissions and the rolling, 12-month summations of the coatings used in emissions unit K008 for each month. These quarterly reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.

E. Testing Requirements

1. Compliance with the emission and usage limitations specified in the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitations:

VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied and 40 percent VOC by volume of the coating or ink, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 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 24A.

b. Emission Limitation:

The VOC content of the coatings employed in this emissions unit shall not exceed 8.3% by weight, as applied.

Applicable Compliance Method:

USEPA Method 24A shall be used to determine the VOC contents of the coatings pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternate analytical procedures or alternative precision statements for Method 24A.

Compliance shall be based upon the record keeping requirements specified in section C.1.

c. Emission Limitation:

Volatile Organic Compounds (VOC) emissions shall not exceed 5.31 pounds per hour.

Applicable Compliance Method:

Compliance is determined by multiplying the maximum hourly usage rates of the coating (64.0 lbs/hr) by their maximum allowable VOC contents and adding the results.

d. Emission Limitation:

Volatile Organic Compounds (VOC) emissions shall not exceed 19.89 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.1.

e. Usage Limitations:

The maximum annual usage rates shall not exceed 479,230 pounds of coating.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.1.

F. Miscellaneous Requirements

1. Ambient air quality impacts from the shut down and removal of emissions units K001 and K004 are being used as ambient air quality impact credits towards the increase in ambient air quality impacts associated with this emissions unit (K008). Therefore, at no time shall emissions units K001 and K004 operate at the same time as emissions unit K008.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1, D, E, and F.1.