

Facility ID: 1431050845 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: 1431050845 Emissions Unit ID: K002 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>
K002-Two Color Flexographic Printing Presses with Folder/Gluer (modification)	OAC rule 3745-31-05(A)(3) (PTI 14-04263)	Volatile Organic Compound (VOC) emissions shall not exceed 194.4 lbs/day. The requirements of this rule also include compliance with OAC rules 3745-21-09(Y) and 3745-31-05(C). See section B.1.
	OAC rule 3745-21-09(Y)	See A.2.c.
	OAC rule 3745-31-05(C)	Volatile Organic Compound (VOC) emissions shall not exceed 6.3 TPY based on a rolling, 12-month summation. See term A.2.b.

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of compliance coatings and emission limitations. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units B001, B004, B005 K002, K005, other de minimus air contaminant source, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, 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 VOC content of the coatings and inks employed shall not exceed the following limitations:
 - a. forty percent VOC by volume of the coating and ink, excluding water; or
 - b. twenty-five percent VOC by volume of the volatile matter in the coating and ink.

B. Operational Restrictions

1. Emissions Unit K002 shall be limited to the following usages:
 - Inks & Coatings 15,000 gallons/year
 - Cleanup materials 200 gallons/year.

This usage rate may be exceeded provided the annual VOC emission limitation is not exceeded.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units identified in term A.2.b:
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

- c. the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of gallons of each coating employed;
 - 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 gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
 - j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
 - k. the updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceeding eleven calendar months; and
l. the updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceeding eleven calendar months.
- * 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.
2. The permittee shall maintain daily records which list the following information for each ink, coating and cleanup material employed in this emissions unit:
 - a. the company identification of each ink, coating and cleanup material employed;
 - b. the percent VOC by volume of each coating and ink employed, excluding water;
 - c. the percent VOC by volume of the volatile matter in each coating and ink employed;
 - d. the VOC content of each coating, ink and cleanup material employed, in pounds per gallon;
 - e. the total gallons of each coating, ink and cleanup material employed;
 - f. the total VOC emissions (the sum of (d) times (e) for all coatings, inks and cleanup materials employed); and
 - g. the rolling, 12-month summation of the total VOC emissions.
 3. The permit to install for emissions unit K002 was evaluated based on the actual materials (typically coatings and cleanup materials) 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): 17,413

Total Maximum Hourly Emission Rate (lbs/hr): 2.8

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence line (ug/m3): 169

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 415

Physical changes to or in the method of operation of the emissions unit after it's 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 cleanup 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) is (are) defined as a modification under other provisions

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 of any exceedance of the HAP usage limitations set forth in this Permit to Operate. 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 immediately notify the Hamilton County Department of Environmental Services of any exceedance of the VOC content limitations. A copy of the daily record showing the exceedance shall be submitted within 30 days after the end of the calendar month.
3. The permittee shall immediately notify the Hamilton County Department of Environmental Services of any exceedance of the daily VOC emission limitation. A copy of the daily record showing the exceedance shall be submitted within 30 days after the end of the calendar month.
4. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services summarizing the above information for the ink, coating and cleanup materials employed in emissions unit K002. These reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

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 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 HAP emission limitations in term A.2.b shall be demonstrated by the record keeping requirements established in section C.1.
3. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 194.4 lbs/day.

Volatile Organic Compound (VOC) emissions shall not exceed 6.3 TPY based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by the records in section C.2. The daily emissions limitation is the sum of VOC in the cleanup and coatings and was calculated by multiplying the maximum coating usage rate of 239 gallons per day by the maximum VOC content employed of 0.74 pounds of VOC per gallon plus the maximum cleanup usage rate of 2.5 gallons per day by the maximum VOC content employed of 7 pounds of VOC per gallon.

Compliance with the annual VOC emission rate limitation is based on the annual usage rate of cleanup (200 gallons) and coatings (15,000 gallons) and the maximum VOC content employed of 7 lbs of VOC/gallon for cleanup and 0.74 lb of VOC/gallon for coatings.

b. VOC content limitations:

forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; and

twenty-five percent VOC by volume of the volatile matter in the coating or ink.

Applicable Compliance Method:

Compliance with the VOC content limitations above shall be based on the record keeping requirements established in section C.2.

F. Miscellaneous Requirements

1. None