

Facility ID: 1431050845 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: 1431050845 Emissions Unit ID: K004 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>
K004 - Five color flexographic press for printing and coating paperboard with 4 ovens	OAC rule 3745-31-05(A)(3) 14-05487	Volatile organic compound (VOC) emissions shall not exceed 22.0 lbs/hour and 12.3 TPY. See terms A.2.d and B.1. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a) and 40 CFR Part 63, Subpart KK. See term A.2.c. See terms A.2.e. and f.
OAC rule 3745-21-09(Y)(1)(a) 40 CFR Part 63, Subpart KK		

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations, VOC content limitations, and VOC input limitations.
The hourly emission limitations 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 VOC content of the coatings and inks employed in this emissions unit shall not exceed the following:
 - i. forty percent VOC by volume of the coatings and inks, excluding water, and exempt solvents; or
 - ii. twenty-five percent VOC by volume of the volatile matter in the coatings and inks.
The VOC content of the coatings and inks employed in this emissions unit shall not exceed 0.5 pound VOC per gallon, as applied, as a monthly, volume-weighted average.
The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units B001 (Rite Mod. No. A200 Boiler), B002 (Natural Gas Space Heaters), B003 (Clayton Mod. No. ECG-200 Nat. Gas Boilers), K001(Six color Flexographic Printing Press), K002 (Flexographic Press #2), K003 (2-Color Flexographic Press with Folder) and K004 (Five color flexographic press) 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.

* This assumes the HAP's emitted are the same as the amount of HAP's used, since all HAP's used evaporate.

The permittee has existing records to demonstrate compliance with this limit upon permit issuance. The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

B. Operational Restrictions

1. The permittee shall not use, by weight of VOC, more than 12.3 tons per year (VOC input) from the use of coatings and inks in this emissions unit. The VOC input shall be determined by multiplying the number of gallons of coating and ink employed per month by the VOC content of each coating and ink, in pounds per gallon then dividing by 2000 pounds per ton.

This assumes that the coating and ink usages are 100% emitted as VOCs.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month from emissions units B001*** (Rite Mod. No. A200 Boiler), B002*** (Natural Gas Space Heaters), B003*** (Clayton Mod. No. ECG-200 Nat. Gas Boilers), K001(Six color Flexographic Printing Press), K002 (Flexographic Press #2), K003 (2-Color Flexographic Press with Folder) and K004 (Five color flexographic press):
 - a. the name and identification number of each ink and coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each ink and 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 ink and coating, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each ink and 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 preceding 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 preceding 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.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

*** It is noted that the above record keeping is mainly for emissions units K001-K004 which are primarily coating operations. However, since the HAP restriction is a facility wide restriction, then the permittee is required to collect and record any HAP emissions emitting from emissions units B001-B003 as part of the facility-wide HAP emissions emitted from the above mentioned emissions units.
2. The permittee shall maintain monthly records which list the following information for each ink, coating, and cleanup material employed in emissions unit K004:
 - a. the company identification of each ink, coating, and cleanup material employed;
 - b. the percent VOC by volume of each ink and coating employed, excluding water and exempt solvents or the percent VOC by volume of the volatile matter in each coating and ink employed;
 - c. the VOC content of each ink, coating, and cleanup material employed, in pounds per gallon;
 - d. the total gallons of each ink, coating, and cleanup material employed;
 - e. the total VOC emissions and VOC input per month [the sum of (c) times (d) for all inks, coatings and cleanup materials employed].
 - f. the total annual VOC emissions and VOC input will be the sum of monthly VOC emissions and VOC input for the calendar year.
 - g. the percent triethanolamine, by weight, of each ink, coating and cleanup material employed;
 - h. the total pounds of each material employed that contain triethanolamine; and
 - i. the total triethanolamine emissions per month [(g) times (h) for all inks, coatings and cleanup materials employed].
 - j. the VOC content of the coatings and inks, as applied based on a monthly volume- weighted average [the sum of (c) times (d) for all inks and coatings employed divided by the total volume of all coatings and inks for the month].
3. The permit to install for emissions unit K004 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): 5.3

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence line (ug/m3): 321

Maximum Acceptable Ground-Level Concentration (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 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 submit deviation (excursion) reports that identify any exceedance of the HAP usage limitations set forth in term A.2.e.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or inks (i.e., the VOC content limitations in term A.2.c and A.2.d). The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
3. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
4. The permittee shall submit annual reports which specify the total volatile organic compound emissions, VOC input and the coating and ink usage from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings and cleanup materials employed in this emissions unit. 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 emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
22.0 lbs VOC/hour
 - Applicable Compliance Method:
The hourly VOC emission rate is based on the emissions unit potential to emit. The potential to emit was calculated by multiplying the maximum hourly square foot production rate by the maximum VOC emissions rate per square foot or 0.312 million square feet/hour by 70.41 lbs VOC/million square feet.
 - b. Emission Limitation:
12.3 TPY VOC from inks and coatings.

Applicable Compliance Method:
Compliance shall be determined by the records in term C.2.

3. Emission Limitation:
The total allowable usage of Hazardous Air Pollutants (HAPs) from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:
Compliance with the HAPs usage limitations above shall be based on the record keeping requirements established in term C.1.
4. Usage VOC input limitations
12.3 tons of VOC per year (VOC input) from coating and ink usage

Applicable Compliance Method:
Compliance with the VOC input limitation above shall be based on the record keeping requirements established in term C.2.
5. VOC content limitations:

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

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

0.5 pound VOC per gallon, as applied, and as a monthly, volume-weighted average.

Applicable Compliance Method:
Compliance with the VOC content limitations above shall be based on the record keeping requirements established in term C.2.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary for triethanolamine because the emissions unit's annual emissions for this toxic compound will be limited to less than 1.0 ton. The permittee is hereby advised that if the triethanolamine emissions exceed 1.0 ton per year, the permittee shall notify this agency in writing and shall perform air toxics modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy."