

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: K005 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>
K005 - Six Color Flexographic Press	OAC rule 3745-31-05(A)(3) (#14-05866)	The Volatile Organic Compound (VOC) emissions shall not exceed 26.0 lbs/hour. See terms and conditions A.2.a, A.2.b and A.2.d.
	OAC rule 3745-21-09(Y)(1)(a)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), OAC rule 3745-31-05(C) and 40 CFR Part 63, Subpart KK.
	OAC rule 3745-31-05(C)	See term and condition A.2.c.
	Synthetic minor to avoid Non-attainment New Source Review and major source status for 40 CFR Part 63, Subpart KK	VOC emissions shall not exceed 13.00 TPY as a rolling twelve month summation.
	40 CFR Part 63, Subpart KK	See terms and conditions A.2.e and section B.1.
	ORC 3704.03(F)(4)(d)	See term and condition A.2.f. See term and condition C.3.

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, VOC content limitations, and VOC input limitations. The hourly emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with this limitation. 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 1.0 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 unit K001 (6 color flexographic wide web press), emissions unit K002 (50 inch flexo folder gluer 2 color), emissions unit K003 (flexo folder gluer No. 2), emissions unit K004 (5 color flexographic press), emissions unit K005 (6 color flexographic press) including all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to be installed air contaminant sources, 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.

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 limitation 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 employ more than 13.00 tons of VOC per year (VOC input) from coating and ink usage, as a rolling 12 month summation. 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.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of permit to install number 14-05866, the permittee shall not exceed the cumulative VOC input levels specified in the following table:

Month(s) Maximum Allowable VOC Input (Tons)

- 1-2
- 1-2 4
- 1-3 5
- 1-4 6
- 1-5 7
- 1-6 8
- 1-7 9
- 1-8 10
- 1-9 11
- 1-10 12
- 1-11 13
- 1-12 13

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of permit to install number 14-05866, compliance with the annual total VOC input limitation for emissions unit K005 be based upon a rolling, 12 month summation of the total VOC input.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.e:
 - 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.
2. The permittee shall maintain monthly records which list the following information for each ink, coating, and cleanup material employed in emissions unit K005:
 - 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 rolling 12 month VOC emissions, and rolling 12 month VOC input, shall be the sum of monthly VOC emissions and VOC input, respectively. This shall include the information for the current month and the preceding eleven calendar months.
 - g. 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 K005 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: dimethylethanolamine

TLV (ug/m3): 18,229

Total Maximum Hourly Emission Rate (lbs/hr): 1.56

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence line (ug/m3): 94

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 434

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

- 1. An affected source subject to this subpart shall submit an initial notification per the requirements of 40 CFR 63.9 (b) which includes the following information:
 - a. the name and mailing address of the permittee;
 - b. the physical location of the source if it is different from the mailing address;
 - c. identification of the relevant MACT standard and the permittee's compliance date;
 - d. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - e. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT operating parameter and emissions exceedances.

The notification shall be submitted within 120 days after initial start-up.
- 2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.e. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
- 3. 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.
- 4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling 12 month VOC emissions limitation or the rolling 12 month VOC input limitation outlined in sections A.1

and B.1. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

5. 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.
6. 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. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

The Volatile Organic Compound (VOC) emissions shall not exceed 26.0 lbs/hour.

Applicable Compliance Method:

The hourly VOC emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by multiplying the maximum hourly square foot production rate by the maximum VOC emission rate per square foot or 0.194 million square feet/hour by 134.0 lbs of VOC/million square feet, as provided in PTI application number 14-05866 submitted on July 24, 2006.

Emission Limitation:

VOC emissions shall not exceed 13.00 TPY as a rolling twelve month summation.

Applicable Compliance Method:

Compliance shall be determined by the record keeping required in section C.2.

Emission Limitations:

The total allowable emission of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.e 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 HAP emission limitations shall be based on the record keeping requirements established in section C.1.

2. Emission Limitation:

The permittee shall not employ more than 13.00 tons of VOC per year (VOC input) from coating and ink usage, as a rolling 12 month summation.

Applicable Compliance Method:

Compliance with the VOC input limitation of 13.0 tons of VOC per year (VOC input) from coating and ink usage shall be based on the record keeping requirements established in section C.2.

3. Compliance with the VOC content limitations in terms and conditions A.2.c and A.2.d shall be based on the record keeping requirements established in section C.2.
4. 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.
5. Compliance with the requirements of term and condition A.2.f shall be demonstrated by the record keeping in term and condition C.1 and reporting in section D.1 and D.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.2, D and E.