

Facility ID: 1431053871 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: 1431053871 Emissions Unit ID: K001 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>
Flexographic press (Mark Andy)	OAC rule 3745-31-05 (PTI 14-4414)	Daily VOC emissions* including cleanup from this emissions unit shall not exceed 257.8 lbs. Combined VOC emissions including cleanup from K001 and K002 shall not exceed 50 TPY.
		See A.2.a. - A.2.b.
		* The daily emission limitation is based upon the emissions unit's PTE. Therefore, no daily records are required to demonstrate compliance with this limit.
	OAC rule 3745-21-09(Y)	None

2. Additional Terms and Conditions

- (a) The VOC content of each ink and cleanup material shall not exceed the following:
 - i. 6.5 pounds of VOC per gallon of ink as applied, excluding water and exempt solvents; and,
 - ii. 7.67 pounds of VOC per gallon of cleanup material.
- The potential emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs. Compliance with the above limitations shall be determined on a rolling, 12-month summation.

B. Operational Restrictions

1. To ensure an evaporative OC/VOC loss from the hand cleanup process of no more than 50 percent (by weight) from solvents having a vapor pressure of 10 mm Hg (0.19 psia) or lower at 20 degrees Celsius (68 degrees Fahrenheit), all rags utilized in the cleanup process shall be stored in containers with tight fitting covers.
2. To ensure an evaporative OC/VOC loss from the hand cleanup process of no more than 75 percent (by weight) from solvents having a vapor pressure greater than 10 mm Hg (0.19 psia) at 20 degrees Celsius (68 degrees Fahrenheit), all rags utilized in the cleanup process shall be stored in containers with tight fitting covers.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information monthly for emission units K001 and K002 for the purpose of determining annual VOC emissions:
 - a. the name and identification of each ink and cleanup material, as employed;
 - b. the VOC content of each ink and cleanup material, in pounds per gallon;
 - c. the VOC content of each ink and cleanup material, in pounds per gallon, excluding water and exempt solvents;
 - d. the number of gallons of each ink and cleanup material employed; and
 - e. the total VOC emissions from all inks and cleanup materials employed, in tons (summation of $\{(b \times d/2000) \times (1 - 0.02)^n\}$ for each ink plus summation of $\{(b \times d/2000) \times \text{rag retention factor}^{**}\}$ for each cleanup material).

* It is assumed that there is a 2% solvent retention in the substrate so the actual emissions are determined by multiplying with the factor (1 - .02).

** Rag retention factor can be determined by the Special Terms and Conditions in Part II, Sections B.1. and B.2.

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, as employed;
 - b. the individual HAP content for each HAP of each ink in pounds of individual HAP per gallon of ink, as applied;
 - c. the total combined HAP content of each ink in pounds of combined HAPs per gallon of ink, as applied (sum all the individual HAP contents from (b) for each ink);
 - d. the number of gallons of each ink 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) for each cleanup material);
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all inks and cleanup materials employed, in tons per month (for each HAP, the sum of (b) times (d) for each ink plus the sum of (f) times (h) for each cleanup material, and dividing the total by 2,000);
 - j. the total combined HAP emissions from all inks and cleanup materials employed, in tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material, and dividing the total by 2,000];
 - k. the rolling, 12-month summation for individual HAP emissions for each HAP, in tons (this shall include the information for the current month and the preceding eleven calendar months); and
 - l. the rolling, 12-month summation for total combined HAP emissions, in 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 Ohio EPA, District Office or local air agency contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from emissions units K001 and K002 and the individual and combined HAP emissions from the facility for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in Additional Term and Condition A.2. 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.

E. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) cleanup materials and (b) flexographic inks, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular cleanup material or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that cleanup material or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. The annual VOC emissions from emissions units K001 and K002 shall be determined by the summation of the monthly VOC emissions from the record keeping in Term and Condition C.1.e. for any calendar year.
3. Compliance with the HAP emission limits shall be determined by the recordkeeping in Terms and Conditions C. Formulation data shall be used to determine the individual HAP content of each cleanup material and ink.

F. Miscellaneous Requirements

1. If probable cause exist indicating this emissions unit is causing or contributing to a nuisance in violation of OAC rule 3475-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this emissions unit into compliance.