

Facility ID: 1431070383 Issuance type: Draft 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.

[Go to Part II for Emissions Unit R011](#)

[Go to Part II for Emissions Unit R012](#)

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1431070383 Emissions Unit ID: R011 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

**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>
silkscreen line No. 11 with dryer	OAC rule 3745-35-07	9.08 tons per year (TPY) of volatile organic compounds (VOC), including cleanup, based on rolling, 12-month summations
		See Term and Conditions A.2.b., A.2.c., and A.2.d. below.
	OAC rule 3745-21-07(G)	The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), is prohibited; therefore, this emissions unit is exempt from the requirements of this rule.
	OAC rule 3745-31-05 (PTI 14-2918)	See Term and Condition A.2.a.

**2. Additional Terms and Conditions**

- (a) The VOC content, as applied, of each ink and cleanup material shall not exceed the following limitations:

. lbs of VOC/gallon

- Mylar Inks 6.64
- Plastijet Inks 5.83
- Lacquer Inks 6.54
- Miscellaneous Inks 6.82
- Silkscreen Cleanup 7.89

The actual emissions 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 these limitations shall be based on rolling, 12-month summations.

The maximum VOC emissions from this emissions unit shall not exceed 9.08 tons per year, based on a rolling, 12-month summation.

The permittee shall not exceed the usage and emission limits outlined below:

Material gallons/ gallons/ lbs of tons of VOC/  
(As applied) month year\* VOC/month year\*

- Mylar Inks 40 420 265.6 1.39
- Plastijet Inks 80 910 466.4 2.65
- Lacquer Inks 45 510 294.3 1.67
- Misc. Inks 32 364 218.2 1.24
- Silkscreen Cleanup 45 540 355.1 2.13

Total 1599.6 9.08

\* Compliance with the annual usage and emission limits shall be based upon rolling, 12-month summations.

There shall be no HAP emissions from this facility except those that result from the use of the inks and

silkscreen cleanup materials.

**B. Operational Restrictions**

1. The permittee shall store any cloths or equipment used in the manual cleanup of any of the silk screen line equipment in a covered container. When not in use, the lid shall be kept closed on the storage container(s) at all times.
2. Prior to utilizing materials other than those identified in A.2.a, the permittee shall contact the Hamilton County Department of Environmental Services - Division of Air Quality Management (DOES-AM) and supply written information sufficient to determine whether the new material is in compliance with applicable regulations and whether this permit would need to be modified.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month:
  - a. the name and identification of each ink and cleanup material employed;
  - b. the VOC content, as applied, of each ink and cleanup material employed, in pounds of VOC per gallon;
  - c. the total number of gallons employed per month of each type of ink and cleanup material identified in A.2.a;
  - d. the updated rolling, 12-month summation of the total gallons employed for each ink and cleanup material identified in A.2.a;
  - e. the total VOC emissions from each type of ink and cleanup material identified in A.2.a, in pounds;
  - f. the updated rolling, 12-month summation of the total VOC emissions from each type of ink and cleanup material identified in A.2.a, in tons;
  - g. the total VOC emissions from all inks and cleanup materials employed, in pounds;
  - h. the updated rolling, 12-month summation of the total VOC emissions from all inks and cleanup materials employed, in tons; and
  - i. a record of whether or not each ink and cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall maintain monthly records that contain the following information:
  - a. the amount of each cleanup material in the inventory at the beginning of the month, in gallons;
  - b. the amount of each cleanup material in the inventory at the end of the month, in gallons;
  - c. the amount of each cleanup material added to the inventory during the month;
  - d. the amount of each cleanup material collected as waste \*\* during the month, in gallons; and
  - e. the monthly usage of each cleanup material, calculated by using the following mass balance formula:

Monthly usage of cleanup material = sum of (a+c-b-d) for each organic cleanup material employed.

\*\* The permittee shall have the waste material analyzed semiannually to determine the amount (in percent by volume) of cleanup material in the waste. The permittee shall use this number to determine the amount (in gallons) of cleanup material being disposed of in the waste, and shall use the percent waste number in term C.1.d. A copy of the test results shall be maintained on file at the facility.
3. The permittee shall collect and record the following information each month for all emissions units at the entire facility:
  - a. the name and identification number of each ink 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 HAPs content of each ink, in pounds of combined HAPs per gallon of ink, as applied (sum all the individual HAP contents from (b));
  - 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 HAPs 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 (from term C.2.e.);
  - 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), divided by 2000 lbs/ton;
  - j. the total combined HAPs emissions from all coatings, inks, and cleanup materials employed, in tons per month (the sum of (c) times (d) for each ink plus the sum of (g) times (h) for each cleanup material), divided by 2000 lbs/ton;

- k. the updated rolling, 12-month summation of emissions for each individual HAP, in 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 emissions for total combined HAPs, 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 Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

- 1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each month during which any photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such month. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which any of the VOC content limits delineated in Term A.2.a, the HAP limits specified in Term A.2.b., and/or the usage and emissions limits in Term A.2.d were exceeded. The deviation reports shall specify the corrective actions that were taken to achieve compliance. If there was no exceedance, a report is required saying so.
- 3. The permittee shall submit annual reports that specify the total VOC emissions and usages for the materials identified in Term A.2.d, along with a summary of emissions and usages for each calendar month. This report shall be submitted to the Hamilton County Department of Environmental Services by February 15 of each calendar year and shall cover the previous calendar year (January - December).
- 4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services of the updated rolling, 12-month summation of emissions for each individual HAP and the updated rolling, 12-month summation of emissions for total combined HAPs, in tons per year. These reports shall be submitted by January 31 of each year for the preceding calendar year.

**E. Testing Requirements**

- 1. Formulation data or USEPA Method 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the inks and cleanup materials.
- 2. Compliance with the emission, VOC content, and usage limitations as outlined in this permit to operate shall be determined by the record keeping requirements outlined in Term C.

**F. Miscellaneous Requirements**

- 1. Pursuant to OAC rule 3745-35-07, the following terms and conditions are federally enforceable: A - F.

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[Go to the top of this document](#)

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- 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>
silkscreen line No. 12 with dryer	OAC rule 3745-35-07	9.08 tons per year (TPY) of volatile organic compounds (VOC), including cleanup, based on rolling, 12-month summations
		See Term and Conditions A.2.b., A.2.c., and A.2.d. below.
	OAC rule 3745-21-07(G)	The use of photochemically reactive materials, as

defined in OAC rule 3745-21-01(C)(5), is prohibited; therefore, this emissions unit is exempt from the requirements of this rule.

OAC rule 3745-31-05  
(PTI 14-2918)

See Term and Condition A.2.a.

**2. Additional Terms and Conditions**

- (a) The VOC content, as applied, of each ink and cleanup material shall not exceed the following limitations:

. lbs of VOC/gallon

Mylar Inks 6.64  
Plastijet Inks 5.83  
Lacquer Inks 6.54  
Miscellaneous Inks 6.82  
Silkscreen Cleanup 7.89

The actual emissions 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 these limitations shall be based on rolling, 12-month summations.

The maximum VOC emissions from this emissions unit shall not exceed 9.08 tons per year, based on a rolling, 12-month summation.

The permittee shall not exceed the usage and emission limits outlined below:

Material gallons/ gallons/ lbs of tons of VOC/  
(As applied) month year\* VOC/month year\*

Mylar Inks 40 420 265.6 1.39  
Plastijet Inks 80 910 466.4 2.65  
Lacquer Inks 45 510 294.3 1.67  
Misc. Inks 32 364 218.2 1.24  
Silkscreen Cleanup 45 540 355.1 2.13

Total 1599.6 9.08

\* Compliance with the annual usage and emission limits shall be based upon rolling, 12-month summations.

There shall be no HAP emissions from this facility except those that result from the use of the inks and silkscreen cleanup materials.

**B. Operational Restrictions**

1. The permittee shall store any cloths or equipment used in the manual cleanup of any of the silk screen line equipment in a covered container. When not in use, the lid shall be kept closed on the storage container(s) at all times.
2. Prior to utilizing materials other than those identified in A.2.a, the permittee shall contact the Hamilton County Department of Environmental Services - Division of Air Quality Management (DOES-AM) and supply written information sufficient to determine whether the new material is in compliance with applicable regulations and whether this permit would need to be modified.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month:
  - a. the name and identification of each ink and cleanup material employed;
  - b. the VOC content, as applied, of each ink and cleanup material employed, in pounds of VOC per gallon;
  - c. the total number of gallons employed per month of each type of ink and cleanup material identified in A.2.a;
  - d. the updated rolling, 12-month summation of the total gallons employed for each ink and cleanup material identified in A.2.a;
  - e. the total VOC emissions from each type of ink and cleanup material identified in A.2.a, in pounds;
  - f. the updated rolling, 12-month summation of the total VOC emissions from each type of ink and cleanup material identified in A.2.a, in tons;
  - g. the total VOC emissions from all inks and cleanup materials employed, in pounds;
  - h. the updated rolling, 12-month summation of the total VOC emissions from all inks and cleanup materials employed, in tons; and
  - i. a record of whether or not each ink and cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall maintain monthly records that contain the following information:
  - a. the amount of each cleanup material in the inventory at the beginning of the month, in gallons;
  - b. the amount of each cleanup material in the inventory at the end of the month, in gallons;
  - c. the amount of each cleanup material added to the inventory during the month;
  - d. the amount of each cleanup material collected as waste \*\* during the month, in gallons; and

- e. the monthly usage of each cleanup material, calculated by using the following mass balance formula:

Monthly usage of cleanup material = sum of (a+c-b-d) for each organic cleanup material employed.

\*\* The permittee shall have the waste material analyzed semiannually to determine the amount (in percent by volume) of cleanup material in the waste. The permittee shall use this number to determine the amount (in gallons) of cleanup material being disposed of in the waste, and shall use the percent waste number in term C.1.d. A copy of the test results shall be maintained on file at the facility.

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- a. the name and identification number of each ink employed;
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  - c. the total combined HAPs content of each ink, in pounds of combined HAPs per gallon of ink, as applied (sum all the individual HAP contents from (b));
  - 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 HAPs 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 (from term C.2.e.);
  - 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), divided by 2000 lbs/ton;
  - j. the total combined HAPs emissions from all coatings, inks, and cleanup materials employed, in tons per month (the sum of (c) times (d) for each ink plus the sum of (g) times (h) for each cleanup material), divided by 2000 lbs/ton;
  - k. the updated rolling, 12-month summation of emissions for each individual HAP, in 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 emissions for total combined HAPs, 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 Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

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2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which any of the VOC content limits delineated in Term A.2.a, the HAP limits specified in Term A.2.b., and/or the usage and emissions limits in Term A.2.d were exceeded. The deviation reports shall specify the corrective actions that were taken to achieve compliance. If there was no exceedance, a report is required saying so.
3. The permittee shall submit annual reports that specify the total VOC emissions and usages for the materials identified in Term A.2.d, along with a summary of emissions and usages for each calendar month. This report shall be submitted to the Hamilton County Department of Environmental Services by February 15 of each calendar year and shall cover the previous calendar year (January - December).
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services of the updated rolling, 12-month summation of emissions for each individual HAP and the updated rolling, 12-month summation of emissions for total combined HAPs, in tons per year. These reports shall be submitted by January 31 of each year for the preceding calendar year.

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