

Facility ID: 1431071104 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: 1431071104 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- automatic lacquer machine | OAC rule 3745-31-05(A)(3) (PTI 14-4316) | <p>Volatile Organic Compound (VOC) emissions shall not exceed 8.8 pounds per day from coating only.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 1.8 tons per year including cleanup.</p> <p>See term A.2.c, A.2.d, B.1 and B.2.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> |
| | OAC rule 3745-21-09(U)(2)(e)(ii) | |

2. **Additional Terms and Conditions**
 - (a) The daily and annual emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records or reports are required to demonstrate compliance with these limits. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by VOC content limitations and emissions limitations.

The volatile organic compound (VOC) content of each lacquer (coating) employed in this emissions unit shall not exceed 6.11 lbs/gallon, as applied.

The volatile organic compound (VOC) content of each cleanup material employed in this emissions unit shall not exceed 7.09 lbs/gallon.

B. Operational Restrictions

1. The maximum daily coating usage for this emission unit shall not exceed 1.44 gallons per day.
2. The maximum annual cleanup material usage shall not exceed 56.5 gallons per year.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each lacquer (coating) and cleanup material employed.
 - b. The volume, in gallons, of each lacquer (coating) and cleanup material employed.
 - c. The total volume, in gallons, of all lacquers and cleanup materials employed.
 - d. The VOC content of each lacquer and cleanup material employed, in pounds per gallon, as applied.
 - e. The total VOC emission rate for all lacquers and cleanup materials employed, in pounds per month [the sum of (b x d) for each lacquer or cleanup material employed]. These monthly totals shall be utilized to calculate annual VOC emissions.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing any time a coating with a VOC content greater than 6.11 pounds per gallon is used or a cleanup material with a VOC content greater than 7.09 pounds per gallon is used in this emissions unit. This notification is required within 30 days of the occurrence.

E. Testing Requirements

1. Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 8.8 pounds per day from coating only.

Applicable Compliance Method:

The maximum daily emissions were calculated by taking the maximum daily lacquer usage rate of 1.44 gallons of lacquer coating/day x 6.11 pounds of VOC/gallon of lacquer coating.

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 1.8 tons per year including cleanup.

Applicable Compliance Method:

The annual emissions were calculated by taking adding the annual VOC emission rate for lacquer coating to the annual emission rate for the cleanup material.

$(8.8 \text{ pounds of VOC per day} \times 365 \text{ days/year} \times \text{ton}/2000 \text{ pounds}) + (7.09 \text{ pounds of VOC/gallon of cleanup material} \times 56.5 \text{ gallons of cleanup material per year} \times \text{ton}/2000 \text{ pounds})$.

2. 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.

F. Miscellaneous Requirements

1. None