

Facility ID: 1431074107 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: 1431074107 Emissions Unit ID: P003 Issuance type: Final 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>
P003 - Solvent Wipe Cleaning Operation	OAC rule 3745-31-05(A)(3) (PTI 14-05517)	Volatile organic compound emissions shall not exceed 123.9 lbs/day and 22.6 TPY. See term A.2.b. See sections B.1 and B.2.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). See term A.2.a.
	OAC rule 3745-21-07(G)	Exempt per OAC rule 3745-21-07(G)(9). See section B.3.

2. Additional Terms and Conditions

- (a) The total allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001 (Proof Press #1 for Rotogravure Cylinders), K002 (Proof Press #2 for Rotogravure Cylinders), K003 (Proof Press #3 for Rotogravure Cylinders) and P003 (Solvent Wipe Cleaning Operation) including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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.
 The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.34 lbs/gallon.
 Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the usage and emission limitations.
 The daily emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no daily records are required to demonstrate compliance with this limit.

B. Operational Restrictions

1. The maximum amount of cleanup material employed in this emissions unit shall not exceed 6160 gallons/year.
2. The permittee shall store all liquid organic material laden rags in a closed container.
3. The use of photochemically reactive cleanup materials as defined in OAC rule 3745-21-01(C)(5) is prohibited.

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 company identification of each liquid organic material employed;
 - b. the VOC content (in pounds of VOC/gallon) of each cleanup material employed;
 - c. the number of gallons of each cleanup material employed;
 - d. the total VOC emissions, in pounds [summation of (b x c) for all cleanup materials] for the calendar month;

and

- e. a record of each cleanup material employed in this emissions unit, indicating whether or not the cleanup material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003 and P003:
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP*) content for each HAP of each 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 coating, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each 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 emissions 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 emissions 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 emissions 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 emissions 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.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying cleanup materials (i.e. VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.a. If no exceedances occurred, the permittee shall state so in the report.
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 to the Hamilton County Department of Environmental Services which specify the total VOC emissions and the total cleanup material usage from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup 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 day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

E. Testing Requirements

1. a. Emission Limitations:
Volatile organic compound emissions shall not exceed 123.9 lbs/day and 22.6 TPY.

Applicable Compliance Method:
Compliance with the daily VOC emission limitation is determined by multiplying the maximum cleanup material usage of 16.88 gallons by the maximum VOC content of 7.34 lbs/gallon. Compliance with the annual emissions limitation shall be determined by the summing the monthly VOC emissions specified in section C.1 of this permit.
- b. Emission Limitation:
The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.34 lbs/gallon.

Applicable Compliance Method:
Compliance shall be determined by the record keeping requirements specified in section C.1 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of each liquid organic material employed.
- c. Emission Limitation:

The maximum amount of cleanup material employed in this emissions unit shall not exceed 6160 gallons/year.

Applicable Compliance Method:

Compliance with the material usage limitation shall be determined by the record keeping requirements specified in section C.1 of this permit.

d. Emission Limitation:

Total allowable emissions of Hazardous Air Pollutants shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

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

F. **Miscellaneous Requirements**

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