

Facility ID: 1431153991 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: 1431153991 Emissions Unit ID: R002 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>
R002-Superjet No. 7 w/dryer	OAC rule 3745-31-05(A)(3) (PTI 14-05532)	Organic Compound (OC) emissions from coatings only shall not exceed 12.5 pounds per hour. See terms A.2.b, A.2.c, B.1, and B.4.
	OAC rule 3745-21-07(G) OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Exempt. (See term B.1.) Organic Compound (OC) emissions shall not exceed 8.05 tons per year, including cleanup, based upon a rolling, 12-month summation from coatings and cleanup materials. See terms A.2.d, B.2, and B.3.

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with all applicable regulations, use of non-photochemically reactive materials, emission limitations, and OC content and usage limitations.
The OC content (as applied) of each coating shall not exceed 6.24 pounds per gallon of coating.
The OC content of cleanup materials shall not exceed 6.75 pounds per gallon, unless the vapor pressure of the cleanup material is less than 10 mm Hg at standard temperature and pressure. The OC content of cleanup materials having vapor pressure less than 10 mmHg shall not exceed 13.50 pounds per gallon.
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 P001 (Ink room cleanup), P002 (Screen Reclamation process), R002 (Viking screen printing dryer), R004 (Inline 1 - five unit screen printing press for UV inks), R005 (Inline 2 - four unit screen printing press for UV inks), the Komori 640 printing press, the Kamori 526 printing press, and screen printing operations and associated clean up operations identified as LSP1, LSP2, LSP3, P1, P2, P3, E1, E2, S1, and S2 including any de minus air contaminant sources, as defined in OAC rule 3745-15-05, and permanent exemption air contaminant sources 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 hourly emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limitation.

B. Operational Restrictions

1. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.
2. The total amount of coatings (this includes ink, thinner, and reducer) employed in this emissions unit shall not exceed 1500 gallons per year, based upon a rolling, 12-month summation.
3. The total amount of cleanup material employed in this emissions unit shall not exceed 1000 gallons per year, based upon a rolling 12-month summation.
4. All used, solvent soaked rags from the clean-up of this emissions unit shall be stored in containers with tightly

fitting lids.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month:
 - a. The company identification for each coating and cleanup material employed and documentation indicating whether or not the liquid organic material is photochemically reactive as defined by OAC 3745-21-01(C)(5).
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per month (b x c).
 - e. The rolling, 12-month summation of the coating usage figures.
 - f. The rolling, 12-month summation of the cleanup material usage figures.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following information each month for each emissions unit or process identified in term A.2.d of this permit:
 - 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) times (1 - the solvent recovery rate) 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 coatings plus the sum of (g) times (h) times (1 - the solvent recovery rate) for each cleanup material];
 - k. The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the proceeding eleven calendar months; and
 - l. The updated rolling, 12-month summation of the 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.

3. The permit to install for this emissions unit R002 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: Ethylene glycol monomethyl ether

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 12.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1105

MAGLC (ug/m3): 2881

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day 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 organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings or cleanup solvents (i.e., for OC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.d. If no exceedances occurred, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation reports which identify any exceedance of the gallon usage limitations set forth in terms B.2 and B.3 (coating and cleanup material usage limitations) If no exceedances occurred, the permittee shall state so in the report.
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the OC contents of the coatings and cleanup materials.
2. Compliance with the OC emission limitations specified in term A.1. shall be based upon the recordkeeping requirements as specified in term C.1.
3. Compliance with the usage limitations specified in term B.2. and B.3. shall be based upon the recordkeeping requirements as specified in term C.
4. Compliance with the HAP emissions limitation in term A.2.d shall be demonstrated by the recordkeeping in term C.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.