

Facility ID: 1431170674 Issuance type: Title V Proposed Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 1431170674 Issuance type: Title V Proposed Permit

Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

P011 material trim collection system;
P012 roll grinding operation;
P013 photopolymer platemaking process;
R001 primary treater on press 4;
R002 primary treater on press 5;
R003 secondary treater on press 5;
R006 primary treater on Egan No.32;
R007 secondary treater on Egan No.32;
R009 solventless adhesive laminator primary corona PTI 14-05815;
R010 solventless adhesive laminator secondary corona PTI 14-05815;
R011 Press 2 primary corona treater PTI 14-05815;
T001 2,000-gallon fixed roof storage tanks PTI 14-02538;
T002 2,000-gallon fixed roof storage tanks PTI 14-02538;
T003 2,000-gallon fixed roof storage tanks PTI 14-02538; and
T004 2,000-gallon fixed roof storage tanks PTI 14-02538.

Each insignificant emissions unit at this facility must comply with all applicable state and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

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Facility ID: 1431170674 Issuance type: Title V Proposed Permit

b State Only Enforceable Section

1. None

- [Go to Part III for Emissions Unit K004](#)
- [Go to Part III for Emissions Unit K005](#)
- [Go to Part III for Emissions Unit K006](#)
- [Go to Part III for Emissions Unit K007](#)
- [Go to Part III for Emissions Unit K010](#)
- [Go to Part III for Emissions Unit K013](#)
- [Go to Part III for Emissions Unit L001](#)

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Facility ID: 1431170674 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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

Facility ID: 1431170674 Emissions Unit ID: K004 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
K004 - flexographic printing press (#3) with catalytic incinerator	40 CFR Part 63, Subpart KK	The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants (HAPs), and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).
		See Sections A.II.1, A.III.1, A.IV.1 and A.IV.3.a below.
	OAC rule 3745-21-09(Y)(1)(b)	See Section A.I.2.a below.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections A.II.2, A.III.2-A.III.11, A.IV.2, A.V.1.a, A.V.1.c and A.V.3-5 below.

2. Additional Terms and Conditions

- a. This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:
 - (a)
 - i. a capture efficiency which is at least 65 percent by weight; and
 - ii. a destruction efficiency which is at least 90 percent by weight.

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

[Go to the top of Part III for this Emissions Unit](#)

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II. Operational Restrictions

1. Should HAP usage for the facility exceed either:
 - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820 (a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT

requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart KK)

2. This emissions unit shall be operated with an interlock system which prevents the operation of the printing press when the catalytic oxidizer is not in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64)

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

[Go to the top of Part III for this Emissions Unit](#)

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as applied;
 - c. the total combined HAP content of each coating, in pounds of combined HAPs per pound of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of pounds 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 pound of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of pounds of each cleanup material employed;
 - i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (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 usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
 - k. the total individual HAP emissions for each HAP for all emissions units at the facility other than the printing lines, in tons;
 - l. the total combined HAP emissions for all emissions units at the facility other than the printing lines, in tons;
 - m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;
 - n. the total combined HAP emissions for all emissions units at the facility, in tons;
 - o. the total individual HAP emissions for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
 - p. the total combined HAP emissions for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the temperature immediately upstream and downstream of the incinerator's catalyst bed during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the following information for each day when the catalytic incinerator is in use:
 - a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may use the incinerator's temperature chart to determine the temperature differential across the catalyst bed.
 - c. A log of operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

Whenever the monitored values for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time, deviate from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the average temperature of the exhaust gases immediately before the catalyst bed, for the 3-hour block of time immediately following the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, can not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

The above value is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the above value based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(I) and 40 CFR Part 64.3]

3. The CAM plan for monitoring the control efficiency of the catalytic incinerator controlling VOC emissions from this emissions unit has been developed for the monitoring of inlet temperatures of the catalyst bed. The CAM performance indicator, and indicator ranges, for these temperature requirements are specified in Section A.III.2. When the temperature(s) is outside of the indicator range(s) specified in Section A.III.2, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the catalytic incinerator's temperature indicator range listed in Section A.III.2, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

4. The three-hour average static pressure measured at the inlet plenum to the catalytic incinerator shall be maintained at a value at least 85 % of the value recorded during the most recent emission test that demonstrated the emissions unit was in compliance.

Within 180 days of permit issuance, the permittee shall install, operate, and maintain equipment to monitor the static pressure at the inlet plenum to the catalytic incinerator while the emissions unit is in operation. Units shall be in inches of water. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator on a once per shift basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

5. The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the static pressure measured at the inlet plenum to the catalytic incinerator. The CAM performance indicator, and indicator range, for inlet plenum static pressure is specified in Section A.III.4. When the static pressure is outside of the indicator range specified in Section A.III.4, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the static pressure indicator range listed in Section A.III.4, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time,

the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

6. The range specified in Section A.III.4 is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the range specified in Section A.III.4 based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60)

7. If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

8. The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The VOC conversion efficiency of the catalyst in the catalytic incinerator, as determined during the catalytic activity test, shall be at least 90% at a test temperature that is representative of the normal temperature at the inlet to the catalytic incinerator. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

9. The permittee shall perform an inspection of the catalytic incinerator, including the catalyst bed, on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, as specified in the document entitled "Recommended Annual Inspection Points and Procedures" as submitted to the Ohio EPA on August 9, 2001, and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection. In accordance with the testing schedule in Section A.V.1.c, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in Section A.V.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

10. The permittee shall maintain a record of the results of each annual inspection of the catalytic incinerator, as well as the results of each catalyst activity test required in section A.V.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

11. The CAM plan for this emissions unit has been developed for VOC emissions. The CAM performance indicators for the catalytic incinerator controlling this emissions unit include the average temperature of the exhaust gases immediately before the catalyst bed, the average static pressure at the inlet plenum to the catalytic incinerator, the catalyst activity testing, and an interlock system. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and complying with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to monitoring the temperature of the exhaust gases immediately before the catalyst bed and the static pressure at the inlet plenum to the catalytic incinerator and testing of the catalyst activity and operating an interlock system, the permittee also has an inspection/preventative maintenance program for the catalytic incinerator. Based on the results of the inspection/preventative maintenance program, repairs to the catalytic incinerator shall be made as needed. If the current CAM indicators and/or the catalytic incinerator system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64.6(d) and 64.7]

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

[Go to the top of Part III for this Emissions Unit](#)

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IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.1.i through A.III.1.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed (as determined by the continuous temperature monitor) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance when the emissions unit is in operation;

- b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance;
- c. a summary of the operating time for the capture (collection) system, control device, monitoring equipment, and the emissions unit;
- d. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- e. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average temperature of the exhaust gases immediately before the catalyst bed into compliance with the acceptable value, was determined to be necessary and was not taken; and
- f. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]
NOTE: A temperature difference across the catalyst bed that was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance is not necessarily indicative of a violation of the control efficiency limitation for VOC.

- 3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month, HAP usage limitations specified in Section A.II.1; and
 - b. all deviations of the static pressure range specified in Section A.III.4.

The quarterly deviation (excursion) reports shall be submitted in accordance with Part I - Section A.1.c of the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart KK and 40 CFR Part 64)

- 4. The permittee shall submit reports that include the results of the catalyst activity tests required in section A.V.1.c. These reports shall be submitted within 45 days after each catalyst activity test is performed.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

- 5. The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the external structural integrity of the catalytic incinerator has been jeopardized and it no longer operates as designed. These reports shall include information required by 40 CFR Part 64.9(a).

[Authority of term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

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

[Go to the top of Part III for this Emissions Unit](#)

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V. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
 - a. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 6 months prior to the expiration date of this permit. The emission testing shall be conducted for emissions units K004-K007 on a rotating basis using one representative press during each 5 year test effort.

The emission testing shall be conducted to demonstrate compliance with the 65%, by weight, capture and 90%, by weight, control efficiency requirements;

The following test method(s) shall be employed:

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or other approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- a. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services,

The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator and the temperature of the exhaust gases immediately before the catalyst bed at 15-minute intervals during each

test run. These values shall be used to determine the indicator ranges identified in A.III.2 and A.III.4.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

(Authority for term: 3745-77-07(C)(1), OAC rule 3745-21-10, 3745-21-09(Y)(1)(b), and 40 CFR Part 64).

- b. Emission Limitation:
9.1 Mg (10 tons) per each rolling 12-month period of any single HAP, or 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAPs.

Applicable Compliance Method:
Compliance with the HAP usage limitations in Section A.II.1 shall be demonstrated by the record keeping in Section A.III.1.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KK)

- c. The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in Section A.III.9. An intent to test notification shall not be required for the testing noted in this term. The procedures for the catalyst activity test shall be in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1) and CFR Part 64]

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

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1431170674 Issuance type: Title V Proposed Permit

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

Facility ID: 1431170674 Emissions Unit ID: K004 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
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K004 - flexographic printing press (#3) with catalytic incinerator		
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- 2. **Additional Terms and Conditions**

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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II. **Operational Restrictions**

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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

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

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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IV. **Reporting Requirements**

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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V. **Testing Requirements**

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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

VI. **Miscellaneous Requirements**

- 1. None

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

Facility ID: 1431170674 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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

Facility ID: 1431170674 Emissions Unit ID: K005 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
K005 - flexographic printing press (#4) with catalytic incinerator	40 CFR Part 63, Subpart KK	The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants (HAPs), and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).
	OAC rule 3745-21-09(Y)(1)(b)	See Sections A.II.1, A.III.1, A.IV.1 and A.IV.3.a below.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Section A.I.2.a below. See Sections A.II.2, A.III.2-A.III.11, A.IV.2, A.V.1.a, A.V.1.c and A.V.3-5 below.

2. Additional Terms and Conditions

- a. This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:
 - (a)
 - i. a capture efficiency which is at least 65 percent by weight; and
 - ii. a destruction efficiency which is at least 90 percent by weight.

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

[Go to the top of Part III for this Emissions Unit](#)

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II. Operational Restrictions

1. Should HAP usage for the facility exceed either:
 - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820 (a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart KK)
2. This emissions unit shall be operated with an interlock system which prevents the operation of the printing press when the catalytic oxidizer is not in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64)

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

[Go to the top of Part III for this Emissions Unit](#)

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as applied;
 - c. the total combined HAP content of each coating, in pounds of combined HAPs per pound of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of pounds 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 pound of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per pounds of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of pounds of each cleanup material employed;
 - i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (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 usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
 - k. the total individual HAP emissions for each HAP for all emissions units at the facility other than the printing lines, in tons;
 - l. the total combined HAP emissions for all emissions units at the facility other than the printing lines, in tons;
 - m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;
 - n. the total combined HAP emissions for all emissions units at the facility, in tons;
 - o. the total individual HAP emissions for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
 - p. the total combined HAP emissions for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)
2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the temperature immediately upstream and downstream of the incinerator's catalyst bed during operation of this

emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the following information for each day when the catalytic incinerator is in use:

a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may use the incinerator's temperature chart to determine the temperature differential across the catalyst bed.

c. A log of operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

Whenever the monitored values for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time, deviate from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the average temperature of the exhaust gases immediately before the catalyst bed, for the 3-hour block of time immediately following the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, can not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

The above value is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the above value based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(I) and 40 CFR Part 64.3]

3. The CAM plan for monitoring the control efficiency of the catalytic incinerator controlling VOC emissions from this emissions unit has been developed for the monitoring of inlet temperatures of the catalyst bed. The CAM performance indicator, and indicator ranges, for these temperature requirements are specified in Section A.III.2. When the temperature(s) is outside of the indicator range(s) specified in Section A.III.2, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the catalytic incinerator's temperature indicator range listed in Section A.III.2, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

4. The three-hour average static pressure measured at the inlet plenum to the catalytic incinerator shall be maintained at a value at least 85 % of the value recorded during the most recent emission test that demonstrated the emissions unit was in compliance.

Within 180 days of permit issuance, the permittee shall install, operate, and maintain equipment to monitor the static pressure at the inlet plenum to the catalytic incinerator while the emissions unit is in operation. Units shall be in inches of water. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator on a once per shift basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

5. The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the static pressure measured at the inlet plenum to the catalytic incinerator. The CAM performance indicator, and indicator range, for inlet plenum static pressure is specified in Section A.III.4. When the static pressure is outside of the indicator range specified in Section A.III.4, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the static pressure indicator range listed in Section A.III.4, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

6. The range specified in Section A.III.4 is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the range specified in Section A.III.4 based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60)

7. If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

8. The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The VOC conversion efficiency of the catalyst in the catalytic incinerator, as determined during the catalytic activity test, shall be at least 90% at a test temperature that is representative of the normal temperature at the inlet to the catalytic incinerator. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

9. The permittee shall perform an inspection of the catalytic incinerator, including the catalyst bed, on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, as specified in the document entitled "Recommended Annual Inspection Points and Procedures" as submitted to the Ohio EPA on August 9, 2001, and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection. In accordance with the testing schedule in Section A.V.1.c, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in Section A.V.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

10. The permittee shall maintain a record of the results of each annual inspection of the catalytic incinerator, as well as the results of each catalyst activity test required in section A.V.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

11. The CAM plan for this emissions unit has been developed for VOC emissions. The CAM performance indicators for the catalytic incinerator controlling this emissions unit include the average temperature of the exhaust gases immediately before the catalyst bed, the average static pressure at the inlet plenum to the catalytic incinerator, the catalyst activity testing, and an interlock system. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and complying with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to monitoring the temperature of the exhaust gases immediately before the catalyst bed, the average static pressure at the inlet plenum to the catalytic incinerator, testing of the catalyst activity, and operating an interlock system, the permittee also has an inspection/preventative maintenance program for the catalytic incinerator. Based on the results of the inspection/preventative maintenance program, repairs to the catalytic incinerator shall be made as needed. If the current CAM indicators and/or the catalytic incinerator system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64.6(d) and 64.7]

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

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.1.i through A.III.1.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

- a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed (as determined by the continuous temperature monitor) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance when the emissions unit is in operation;

- b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance;

- c. a summary of the operating time for the capture (collection) system, control device, monitoring equipment, and the emissions unit;

- d. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

- e. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average temperature of the exhaust gases immediately before the catalyst bed into compliance with the acceptable value, was determined to be necessary and was not taken; and

- f. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]
NOTE: A temperature difference across the catalyst bed that was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance is not necessarily indicative of a violation of the control efficiency limitation for VOC.

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. all exceedances of the rolling, 12-month, HAP usage limitations specified in Section A.II.1; and

- b. all deviations of the static pressure range specified in Section A.III.4.

The quarterly deviation (excursion) reports shall be submitted in accordance with Part I - Section A.1.c of the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart KK and 40 CFR Part 64)

4. The permittee shall submit reports that include the results of the catalyst activity tests required in section A.V.1.c. These reports shall be submitted within 45 days after each catalyst activity test is performed.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

5. The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the external structural integrity of the catalytic incinerator has been jeopardized and it no longer operates as designed. These reports shall include information required by 40 CFR Part 64.9(a).

[Authority of term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

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

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

- a. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 6 months prior to the expiration date of this permit. The emission testing shall be conducted for emissions units K004-K007 on a rotating basis using one representative press during each 5 year test effort.

The emission testing shall be conducted to demonstrate compliance with the 65%, by weight, capture and 90%, by weight, control efficiency requirements;

The following test method(s) shall be employed:

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or other approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- a. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services,

The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator and the temperature of the exhaust gases immediately before the catalyst bed at 15-minute intervals during each test run. These values shall be used to determine the indicator ranges identified in A.III.2 and A.III.4.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

(Authority for term: 3745-77-07(C)(1), OAC rule 3745-21-10, 3745-21-09(Y)(1)(b), and 40 CFR Part 64).

- b. Emission Limitation:
9.1 Mg (10 tons) per each rolling 12-month period of any single HAP, or 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAPs.

Applicable Compliance Method:
Compliance with the HAP usage limitations in Section A.II.1 shall be demonstrated by the record keeping in Section A.III.1.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KK)

- c. The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in Section A.III.9. An intent to test notification shall not be required for the testing noted in this term. The procedures for the catalyst activity test shall be in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1) and CFR Part 64]

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

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 1431170674 Issuance type: Title V Proposed Permit

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

Facility ID: 1431170674 Emissions Unit ID: K005 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
K005 - flexographic printing press (#4) with catalytic incinerator		
2. Additional Terms and Conditions		
1. None		

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

[Go to the top of Part III for this Emissions Unit](#)

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II. Operational Restrictions

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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V. Testing Requirements

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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

VI. Miscellaneous Requirements

- 1. None

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

Facility ID: 1431170674 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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

Facility ID: 1431170674 Emissions Unit ID: K006 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
K006 - flexographic printing press (#5) with catalytic incinerator	40 CFR Part 63, Subpart KK	The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants (HAPs), and is subject only to the record keeping and

reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

See Sections A.II.1, A.III.1, A.IV.1 and A.IV.3.a below.

OAC rule 3745-21-09(Y)(1)(b)
40 CFR Part 64 Compliance
Assurance Monitoring (CAM)

See Section A.I.2.a below.
See Sections A.II.2, A.III.2-A.III.11, A.IV.2, A.V.1.a, A.V.1.c and A.V.3-5 below.

2. Additional Terms and Conditions

- a. This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:
 - (a)
 - i. a capture efficiency which is at least 65 percent by weight; and
 - ii. a destruction efficiency which is at least 90 percent by weight.

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

[Go to the top of Part III for this Emissions Unit](#)

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II. Operational Restrictions

- 1. Should HAP usage for the facility exceed either:
 - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820 (a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart KK)
- 2. This emissions unit shall be operated with an interlock system which prevents the operation of the printing press when the catalytic oxidizer is not in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64)

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

[Go to the top of Part III for this Emissions Unit](#)

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as applied;
 - c. the total combined HAP content of each coating, in pounds of combined HAPs per pound of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of pounds 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 pound of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of pounds of each cleanup material employed;
 - i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (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 usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
 - k. the total individual HAP emissions for each HAP for all emissions units at the facility other than the printing lines, in tons;

- l. the total combined HAP emissions for all emissions units at the facility other than the printing lines, in tons;
- m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;
- n. the total combined HAP emissions for all emissions units at the facility, in tons;
- o. the total individual HAP emissions for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
- p. the total combined HAP emissions for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the temperature immediately upstream and downstream of the incinerator's catalyst bed during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the following information for each day when the catalytic incinerator is in use:
 - a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may use the incinerator's temperature chart to determine the temperature differential across the catalyst bed.

c. A log of operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

Whenever the monitored values for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time, deviate from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the average temperature of the exhaust gases immediately before the catalyst bed, for the 3-hour block of time immediately following the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, can not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

The above value is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the above value based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(l) and 40 CFR Part 64.3]

3. The CAM plan for monitoring the control efficiency of the catalytic incinerator controlling VOC emissions from this emissions unit has been developed for the monitoring of inlet temperatures of the catalyst bed. The CAM performance indicator, and indicator ranges, for these temperature requirements are specified in Section A.III.2. When the temperature(s) is outside of the indicator range(s) specified in Section A.III.2, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the catalytic incinerator's temperature indicator range listed in Section A.III.2, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up

actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

4. The three-hour average static pressure measured at the inlet plenum to the catalytic incinerator shall be maintained at a value at least 85 % of the value recorded during the most recent emission test that demonstrated the emissions unit was in compliance.

Within 180 days of permit issuance, the permittee shall install, operate, and maintain equipment to monitor the static pressure at the inlet plenum to the catalytic incinerator while the emissions unit is in operation. Units shall be in inches of water. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator on a once per shift basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

5. The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the static pressure measured at the inlet plenum to the catalytic incinerator. The CAM performance indicator, and indicator range, for inlet plenum static pressure is specified in Section A.III.4. When the static pressure is outside of the indicator range specified in Section A.III.4, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the static pressure indicator range listed in Section A.III.4, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

6. The range specified in Section A.III.4 is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the range specified in Section A.III.4 based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60)

7. If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

8. The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The VOC conversion efficiency of the catalyst in the catalytic incinerator, as determined during the catalytic activity test, shall be at least 90% at a test temperature that is representative of the normal temperature at the inlet to the catalytic incinerator. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

9. The permittee shall perform an inspection of the catalytic incinerator, including the catalyst bed, on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, as specified in the document entitled "Recommended Annual Inspection Points and Procedures" as submitted to the Ohio EPA on August 9, 2001, and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection. In accordance with the testing schedule in Section A.V.1.c, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in Section A.V.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

10. The permittee shall maintain a record of the results of each annual inspection of the catalytic incinerator, as well as the results of each catalyst activity test required in section A.V.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

11. The CAM plan for this emissions unit has been developed for VOC emissions. The CAM performance indicators for the catalytic incinerator controlling this emissions unit include the average temperature of the exhaust gases immediately before the catalyst bed, the average static pressure at the inlet plenum to the catalytic incinerator, the catalyst activity testing, and an interlock system. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and complying with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to monitoring the temperature of the exhaust gases immediately before the catalyst bed, the average static pressure at the inlet plenum to the catalytic incinerator, testing of the catalyst activity, and operating an interlock system, the permittee also has an inspection/preventative maintenance program for the catalytic incinerator. Based on the results of the inspection/preventative maintenance program, repairs to the catalytic incinerator shall be made as needed. If the current CAM indicators and/or the catalytic incinerator system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64.6(d) and 64.7]

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

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.1.i through A.III.1.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed (as determined by the continuous temperature monitor) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance when the emissions unit is in operation;

b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance;

c. a summary of the operating time for the capture (collection) system, control device, monitoring equipment, and the emissions unit;

d. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

e. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average temperature of the exhaust gases immediately before the catalyst bed into compliance with the acceptable value, was determined to be necessary and was not taken; and

f. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]
NOTE: A temperature difference across the catalyst bed that was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance is not necessarily indicative of a violation of the control efficiency limitation for VOC.

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- all exceedances of the rolling, 12-month, HAP usage limitations specified in Section A.II.1; and
 - all deviations of the static pressure range specified in Section A.III.4.

The quarterly deviation (excursion) reports shall be submitted in accordance with Part I - Section A.1.c of the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart KK and 40 CFR Part 64)

4. The permittee shall submit reports that include the results of the catalyst activity tests required in section A.V.1.c. These reports shall be submitted within 45 days after each catalyst activity test is performed.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

5. The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the external structural integrity of the catalytic incinerator has been jeopardized and it no longer operates as designed. These reports shall include information required by 40 CFR Part 64.9(a).

[Authority of term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

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

[Go to the top of Part III for this Emissions Unit](#)

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
 - a. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 6 months prior to the expiration date of this permit. The emission testing shall be conducted for emissions units K004-K007 on a rotating basis using one representative press during each 5 year test effort.

The emission testing shall be conducted to demonstrate compliance with the 65%, by weight, capture and 90%, by weight, control efficiency requirements;

The following test method(s) shall be employed:

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or other approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - a. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services,

The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator and the temperature of the exhaust gases immediately before the catalyst bed at 15-minute intervals during each test run. These values shall be used to determine the indicator ranges identified in A.III.2 and A.III.4.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

(Authority for term: 3745-77-07(C)(1), OAC rule 3745-21-10, 3745-21-09(Y)(1)(b), and 40 CFR Part 64).
 - b. Emission Limitation:

9.1 Mg (10 tons) per each rolling 12-month period of any single HAP, or 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP usage limitations in Section A.II.1 shall be demonstrated by the record keeping in Section A.III.1.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KK)
 - c. The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in Section A.III.9. An intent to test notification shall not be required for the testing noted in this term. The procedures for the catalyst activity test shall be in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1) and CFR Part 64]

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

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 1431170674 Issuance type: Title V Proposed Permit

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

Facility ID: 1431170674 Emissions Unit ID: K006 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
<ul style="list-style-type: none"> 2. Additional Terms and Conditions <ul style="list-style-type: none"> 1. None 	<p>K006 - flexographic printing press (#5) with catalytic incinerator</p>	

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

[Go to the top of Part III for this Emissions Unit](#)

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II. Operational Restrictions

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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IV. Reporting Requirements

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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V. Testing Requirements

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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VI. Miscellaneous Requirements

- 1. None

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

Facility ID: 1431170674 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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

Facility ID: 1431170674 Emissions Unit ID: K007 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
K007 - flexographic printing press (#6) with catalytic incinerator	40 CFR Part 63, Subpart KK	The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants (HAPs), and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).
	OAC rule 3745-21-09(Y)(1)(b)	See Sections A.II.1, A.III.1, A.IV.1 and A.IV.3.a below.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Section A.I.2.a below. See Sections A.II.2, A.III.2-A.III.11, A.IV.2, A.V.1.a, A.V.1.c and A.V.3-5 below.

2. Additional Terms and Conditions

- a. This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:
 - (a)
 - i. a capture efficiency which is at least 65 percent by weight; and
 - ii. a destruction efficiency which is at least 90 percent by weight.

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

[Go to the top of Part III for this Emissions Unit](#)

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

II. Operational Restrictions

- 1. Should HAP usage for the facility exceed either:
 - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820 (a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart KK)
- 2. This emissions unit shall be operated with an interlock system which prevents the operation of the printing press when the catalytic oxidizer is not in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64)

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

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as applied;
 - c. the total combined HAP content of each coating, in pounds of combined HAPs per pound of coating, as applied;

applied (sum all the individual HAP contents from (b));

- d. the number of pounds 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 pound of cleanup material, as applied;
- g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as applied (sum all the individual HAP contents from (f));
- h. the number of pounds of each cleanup material employed;
- i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (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 usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
- k. the total individual HAP emissions for each HAP for all emissions units at the facility other than the printing lines, in tons;
- l. the total combined HAP emissions for all emissions units at the facility other than the printing lines, in tons;
- m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;
- n. the total combined HAP emissions for all emissions units at the facility, in tons;
- o. the total individual HAP emissions for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
- p. the total combined HAP emissions for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the temperature immediately upstream and downstream of the incinerator's catalyst bed during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the following information for each day when the catalytic incinerator is in use:
 - a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may use the incinerator's temperature chart to determine the temperature differential across the catalyst bed.
 - c. A log of operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time. Whenever the monitored values for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time, deviate from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the average temperature of the exhaust gases immediately before the catalyst bed, for the 3-hour block of time immediately following the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, can not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, can not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, can not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, can not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, can not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

The above value is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the above value based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(l) and 40 CFR Part 64.3]

3. The CAM plan for monitoring the control efficiency of the catalytic incinerator controlling VOC emissions from this emissions unit has been developed for the monitoring of inlet temperatures of the catalyst bed. The CAM performance indicator, and indicator ranges, for these temperature requirements are specified in Section A.III.2. When the temperature(s) is outside of the indicator range(s) specified in Section A.III.2, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the catalytic incinerator's temperature indicator range listed in Section A.III.2, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

4. The three-hour average static pressure measured at the inlet plenum to the catalytic incinerator shall be maintained at a value at least 85 % of the value recorded during the most recent emission test that demonstrated the emissions unit was in compliance.

Within 180 days of permit issuance, the permittee shall install, operate, and maintain equipment to monitor the static pressure at the inlet plenum to the catalytic incinerator while the emissions unit is in operation. Units shall be in inches of water. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator on a once per shift basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

5. The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the static pressure measured at the inlet plenum to the catalytic incinerator. The CAM performance indicator, and indicator range, for inlet plenum static pressure is specified in Section A.III.4. When the static pressure is outside of the indicator range specified in Section A.III.4, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the static pressure indicator range listed in Section A.III.4, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range.

The permittee shall maintain records of the following information for each investigation of a deviation from the indicator range: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

6. The range specified in Section A.III.4 is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the range specified in Section A.III.4 based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

7. If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

8. The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The VOC conversion efficiency of the catalyst in the catalytic incinerator, as determined during the catalytic activity test, shall be at least 90% at a test temperature that is representative of the normal temperature at the inlet to the catalytic incinerator. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

9. The permittee shall perform an inspection of the catalytic incinerator, including the catalyst bed, on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, as specified in the document entitled "Recommended Annual Inspection Points and Procedures" as submitted to the Ohio EPA on August 9, 2001, and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection. In accordance with the testing schedule in Section A.V.1.c, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in Section A.V.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

10. The permittee shall maintain a record of the results of each annual inspection of the catalytic incinerator, as well as the results of each catalyst activity test required in section A.V.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

11. The CAM plan for this emissions unit has been developed for VOC emissions. The CAM performance indicators for the catalytic incinerator controlling this emissions unit include the average temperature of the exhaust gases immediately before the catalyst bed, the average static pressure at the inlet plenum to the catalytic incinerator, the catalyst activity testing, and an interlock system. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and complying with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to monitoring the temperature of the exhaust gases immediately before the catalyst bed, the average static pressure at the inlet plenum to the catalytic incinerator, testing of the catalyst activity, and operating an interlock system, the permittee also has an inspection/preventative maintenance program for the catalytic incinerator. Based on the results of the inspection/preventative maintenance program, repairs to the catalytic incinerator shall be made as needed. If the current CAM indicators and/or the catalytic incinerator system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64.6(d) and 64.7]

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

[Go to the top of Part III for this Emissions Unit](#)

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IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.1.i through A.III.1.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK]

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed (as determined by the continuous temperature monitor) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance when the emissions unit is in operation;

b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance;

c. a summary of the operating time for the capture (collection) system, control device, monitoring equipment, and the emissions unit;

d. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

e. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average temperature of the exhaust gases immediately before the catalyst bed into compliance with the acceptable value, was determined to be necessary and was not taken; and

f. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

NOTE: A temperature difference across the catalyst bed that was less than 80 percent of the average

temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance is not necessarily indicative of a violation of the control efficiency limitation for VOC.

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month, HAP usage limitations specified in Section A.II.1; and
 - b. all deviations of the static pressure range specified in Section A.III.4.

The quarterly deviation (excursion) reports shall be submitted in accordance with Part I - Section A.1.c of the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart KK and 40 CFR Part 64)

4. The permittee shall submit reports that include the results of the catalyst activity tests required in section A.V.1.c. These reports shall be submitted within 45 days after each catalyst activity test is performed.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

5. The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the external structural integrity of the catalytic incinerator has been jeopardized and it no longer operates as designed. These reports shall include information required by 40 CFR Part 64.9(a).

[Authority of term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

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

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

- a. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 6 months prior to the expiration date of this permit. The emission testing shall be conducted for emissions units K004-K007 on a rotating basis using one representative press during each 5 year test effort.

The emission testing shall be conducted to demonstrate compliance with the 65%, by weight, capture and 90%, by weight, control efficiency requirements;

The following test method(s) shall be employed:

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or other approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- a. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services,

The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator and the temperature of the exhaust gases immediately before the catalyst bed at 15-minute intervals during each test run. These values shall be used to determine the indicator ranges identified in A.III.2 and A.III.4.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

(Authority for term: 3745-77-07(C)(1), OAC rule 3745-21-10, 3745-21-09(Y)(1)(b), and 40 CFR Part 64).

- b. Emission Limitation:
 - 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP, or 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP usage limitations in Section A.II.1 shall be demonstrated by the record keeping

in Section A.III.1.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KK)

- c. The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in Section A.III.9. An intent to test notification shall not be required for the testing noted in this term. The procedures for the catalyst activity test shall be in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1) and CFR Part 64]

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

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

- 1. None

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

Facility ID: 1431170674 Issuance type: Title V Proposed Permit

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

Facility ID: 1431170674 Emissions Unit ID: K007 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
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K007 - flexographic printing press (#6) with catalytic incinerator		
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2. **Additional Terms and Conditions**

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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II. **Operational Restrictions**

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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IV. **Reporting Requirements**

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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V. **Testing Requirements**

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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VI. Miscellaneous Requirements

- 1. None

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

Facility ID: 1431170674 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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

Facility ID: 1431170674 Emissions Unit ID: K010 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
K010 - rotogravure extrusion laminator and coater No. 32	40 CFR 63 Subpart KK OAC rule 3745-21-09(F)	See section A.II.1. below. See section A.I.2.a. below.

2. Additional Terms and Conditions

- a. Coatings applied in the coating operations shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents based upon a weighted average by volume of all coating materials employed in the coating line or printing line in any one day.

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

[Go to the top of Part III for this Emissions Unit](#)

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II. Operational Restrictions

- 1. Should HAP usage for the facility exceed either:
 - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing, the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820(a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

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

[Go to the top of Part III for this Emissions Unit](#)

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for the coating line and shall maintain this information at the facility for a period of three years:
 - a. the name and identification number of each coating, as applied;
 - b. the mass of VOC per volume (excluding water and exempt solvents) and the volume of each coating (excluding water and exempt solvents), as applied; and
 - c. the daily volume-weighted average VOC content of all coatings, as

applied, calculated in accordance with the equation specified in paragraph (B)(9) of rule 3745-21-10 of the Administrative Code for Cvoc,
2.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific "gallons/year" and/or "tons/year" limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(h))

2. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
 - a. the name or identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as applied;
 - c. the total combined HAPs content of each coating, in pounds of combined HAPs per pound of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of pounds of each coating employed;
 - e. the name or identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, as applied;
 - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of pounds of each cleanup material employed;
 - i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (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 HAPs usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
 - k. the total individual HAP usage for each HAP for all emissions units at the facility other than the printing lines in tons;
 - l. the total combined HAPs usage for all emissions units at the facility other than the printing lines, in tons;
 - m. the total individual HAP usage for each HAP for all emissions units at the facility, in pounds or tons;
 - n. the total combined HAPs usage for all emissions units at the facility, in pounds or tons;
 - o. the total individual HAP usage for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
 - p. the total combined HAPs usage for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KK)

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

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(i))
2. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.2.i through A.III.2.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)
3. The permittee shall submit quarterly deviation (excursion) reports for any exceedence of the rolling, 12-month, usage limitations specified in term A.II.1.

The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KK)

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

[Go to the top of Part III for this Emissions Unit](#)

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

V. **Testing Requirements**

1. Compliance with the VOC content limitation in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation:**
Coatings applied in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:
The permittee shall use either USEPA Method 24 for coatings or USEPA Method 24A for flexographic and rotogravure printing inks and related coatings or the coating formulation data from the coating manufacturer and coating user to determine the VOC content.

 (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-10(B)(4))
 - b. **Emission Limitation:**
9.1 Mg (10 tons) per each rolling 12-month period of any single HAP, or 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAPs.

Applicable Compliance Method:
Compliance with the HAP usage limits in Section A.II.1 shall be demonstrated by the record keeping in Section A.III.2.

 (Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KK)

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

[Go to the top of Part III for this Emissions Unit](#)

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

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 1431170674 Issuance type: Title V Proposed Permit

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

Facility ID: 1431170674 Emissions Unit ID: K010 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
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K010 - rotogravure extrusion laminator and coater No. 32		
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2. **Additional Terms and Conditions**

1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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II. **Operational Restrictions**

1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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IV. **Reporting Requirements**

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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V. **Testing Requirements**

- 1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1431170674 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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

Facility ID: 1431170674 Emissions Unit ID: K013 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
K013 - 6-color flexographic printing press	OAC rule 3745-31-05(A)(3) (PTI 14-04781)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 290 pounds per day.</p> <p>Ammonia emissions shall not exceed 1.1 pounds per hour and 3.7 tons per year.</p> <p>The pounds per hour ammonia emission limitation is based upon the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limitation.</p> <p>See section A.I.2.a.</p>
	<p>OAC rule 3745-31-05(C) (PTI 14-04781)</p> <p>OAC rule 3745-21-09(Y)(1)(a)</p>	<p>The requirements of this rule also include compliance with the requirements of 40 CFR 63 Subpart KK.</p> <p>VOC emissions shall not exceed 37.5 tons per year, based on a rolling, 12-month summation.</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> <p>See section A.II.1.</p>
40 CFR Part 63, Subpart KK		

2. Additional Terms and Conditions

- a. The VOC content of the coatings and inks employed in emissions unit K013 shall not exceed twenty (20)

percent VOC as a daily volume-weighted average, excluding water and exempt solvents.

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

[Go to the top of Part III for this Emissions Unit](#)

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II. Operational Restrictions

1. Should HAP usage for the facility exceed either:
 - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing, the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820(a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart KK)

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

[Go to the top of Part III for this Emissions Unit](#)

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day:
 - a. the name or identification number of each coating and ink;
 - b. the VOC content of each coating and ink, in pounds of VOC per pound, as employed;
 - c. the percent VOC by volume of all the coatings and inks (excluding water and exempt solvents), as a daily volume-weighted average. The percent VOC by volume calculation shall be performed as specified in OAC rule 3745-21-10(B)(9);
 - d. the volume, in gallons, of each coating and ink employed; and
 - e. the total combined VOC emissions from all coatings and inks employed, in pounds per day, calculated as the sum of (b)(d) for each coating and ink employed.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
2. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions:
 - a. the name and identification of each cleanup material employed;
 - b. the number of pounds of each cleanup material employed;
 - c. the VOC content of each cleanup material, in pounds per pound;
 - d. the total VOC emissions from all coatings (the daily summation of the VOC emissions recorded in A.III.1.e for all days the emission unit was in operation during the month) and cleanup materials, in pounds per day; and
 - e. the rolling, 12-month summation of the VOC emissions.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(C))
3. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as applied;
 - c. the total combined HAP content of each coating, in pounds of combined HAPs per pound of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of pounds 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 pound of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of pounds of each cleanup material employed;

- i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (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 usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
- k. the total individual HAP emissions for each HAP for all emissions units at the facility other than the printing lines, in tons;
- l. the total combined HAP emissions for all emissions units at the facility other than the printing lines, in tons;
- m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;
- n. the total combined HAP emissions for all emissions units at the facility, in tons;
- o. the total individual HAP emissions for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
- p. the total combined HAP emissions for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)

- 4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-04781: A.III.1-A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. 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 after the exceedance occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
- 2. The permittee shall submit quarterly deviation (excursion) reports for the following information:
 - a. the 37.5 TPY of VOC emission limitations based on rolling, 12-month summation; and
 - b. the rolling, 12-month, HAP usage limitations specified in A.II.1.
(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
- 3. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.2.e for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
- 4. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.3.i through A.III.3.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)
- 5. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04781: A.IV.1-AIV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

- 1. Compliance with the VOC content limitation in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
The VOC content of the coatings and inks shall not exceed twenty (20) percent VOC as a daily volume-weighted average, excluding water and exempt solvents.

- Applicable Compliance Method:
Compliance shall be demonstrated by the information collected and recorded in A.III.1.c.
- (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
- b. Emission Limitation:
9.1 Mg (10 tons) per each rolling 12-month period of any single HAP, or 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAPs.
- Applicable Compliance Method:
Compliance with the HAP usage limitations in Section A.II.1 shall be demonstrated by the record keeping in Section A.III.3.
- (Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KK)
- c. Emission Limitation:
Volatile Organic Compounds (VOC) emissions shall not exceed 290 pounds per day.
- Applicable Compliance Method:
Compliance with the daily emission limitation in section A.I.1 shall be demonstrated by the record keeping requirements specified in section A.III.1.e.
- (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
- d. Emission Limitation:
Ammonia emissions shall not exceed 1.1 pounds per hour and 3.7 tons per year.
- Applicable Compliance Method:
The short term ammonia emission limitations are based upon the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit. Compliance with the annual ammonia limitation is based upon the maximum possible operational time associated with the emissions unit. Compliance is assumed provided compliance is maintained with the rolling, 12-month VOC limitation.
- (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
- e. Emission Limitation:
Volatile Organic Compound (VOC) emissions shall not exceed 37.5 tons per year, based on a rolling, 12-month summation.
- Applicable Compliance Method:
Compliance with the annual emission limitation in section A.I.1 shall be demonstrated by the record keeping requirements specified in section A.III.2.e.
- (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-04781: A.V.1.a - A.V.1.e. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 1431170674 Issuance type: Title V Proposed Permit

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

Facility ID: 1431170674 Emissions Unit ID: K013 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K013 - 6-color flexographic printing press		

- Additional Terms and Conditions**
 - None

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

[Go to the top of Part III for this Emissions Unit](#)

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

II. Operational Restrictions

- None

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

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit K013 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ammonia
 TLV (ug/m3): 17,400
 Maximum Hourly Emission Rate (lbs/hr): 1.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 216
 MAGLC (ug/m3): 414

- The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

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

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

- None

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

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

- None

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

[Go to the top of Part III for this Emissions Unit](#)

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

VI. Miscellaneous Requirements

1. None

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

Facility ID: 1431170674 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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

Facility ID: 1431170674 Emissions Unit ID: L001 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
L001 - cold cleaner (non-halogenated solvent) with cover	OAC rule 3745-21-09(O)(2) (when employing a solvent that is a volatile organic compound (VOC) as defined in OAC rule 3745-21-01(B)(8))	See sections A.I.2.a, A.I.2.b, A.I.2.c and A.I.2.d below.

2. Additional Terms and Conditions

- a. When employing a solvent that is defined as a VOC, the cold cleaner shall be operated with a cover; and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit, or if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand. The cover shall remain closed at all times, except when parts are being handled or solvent is being added or removed.
- b. When employing a solvent that is defined as a VOC, the cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.
- c. When employing solvents, that are defined as VOC's, a freeboard ratio of greater than or equal to 0.7 shall be maintained.
- d. When employing a solvent that is defined as a VOC, the permittee shall not employ a solvent in the cold cleaner with a vapor pressure greater than 1.0 mm Hg (0.019 psi), measured at 20 degrees Celsius (68 degrees Fahrenheit).

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

[Go to the top of Part III for this Emissions Unit](#)

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

II. Operational Restrictions

1. When employing a solvent that is defined as a volatile organic compound in OAC 3745-21-01(B)(8), the cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. A permanent, legible, conspicuous label, summarizing the operating requirements shall be maintained near or attached to the cold cleaner;
 - b. Waste solvent shall be stored in covered containers;
 - c. The cover shall remain closed whenever parts are not being handled in the cleaner;
 - d. Cleaned parts shall drain until dripping ceases;
 - e. If used, a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) shall be supplied at a pressure that does not exceed 10 pounds per square inch gauge; and
 - f. Porous and/or absorbent materials shall not be cleaned in the cold cleaner.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-09(O)(2))

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

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

1. When employing a solvent that is defined as a VOC, the permittee shall maintain records of the following information:
 - a. the types of solvents employed in the cold cleaner, including the chemical name(s) and concentration;
 - b. the vapor pressure of each solvent applied, in pound per square inch absolute, measured at 100 degrees Fahrenheit; and
 - c. the maximum temperature at which the solvent is maintained, if not maintained at room temperatures.

The records for the types of solvents employed during each year and the vapor pressure of each solvent at 100 degrees Fahrenheit shall be maintained for at least 5 years and shall be made available to the director or his representative upon verbal or written request.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(O)(2))

2. When employing a solvent that is defined as a VOC, the permittee shall maintain records of the following information for each solvent purchase:
 - a. the date of purchase;
 - b. the name, company identification, and chemical composition of the solvent; and
 - c. the vapor pressure of each solvent, measured in mm Hg at 20 degrees Celsius (68 degrees Fahrenheit), as determined by ASTM D2879-97, "Standard Test Method for Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope".

These records shall be maintained for at least 5 years and shall be made available to the director or his representative upon verbal or written request.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(O)(2))

3. When non-VOC solvents are employed in the cold cleaner, the permittee shall collect and record the following information.
 - a. the name and chemical composition of each non-VOC solvent;
 - b. the date(s) when the non-VOC solvents use began; and
 - c. the date(s) when the non-VOC solvents were discontinued.

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

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports documenting any period of time in which a VOC based solvent with a vapor pressure greater than 1.0 mm Hg (0.019 psi), measured at 20 degrees Celsius (68 degrees Fahrenheit), was employed in the emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(O)(2))

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

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

1. The free board ratio shall be determined by dividing the height (distance from the solvent surface to the top edge of the degreaser tank) by the width (at the solvent surface).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(O)(2))
2. Compliance with the vapor pressure limitation in Section A.I.2.d shall be demonstrated by the record keeping requirements in Section A.III.2.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(O)(2))

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

[Go to the top of Part III for this Emissions Unit](#)

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VI. Miscellaneous Requirements

1. None

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

Facility ID: 1431170674 Issuance type: Title V Proposed Permit

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

Facility ID: 1431170674 Emissions Unit ID: L001 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
L001 - cold cleaner (non-halogenated solvent) with cover		
2. Additional Terms and Conditions		
<ol style="list-style-type: none"> 1. None 		

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

[Go to the top of Part III for this Emissions Unit](#)

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

II. Operational Restrictions

1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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V. Testing Requirements

1. None

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

[Go to the top of Part III for this Emissions Unit](#)

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VI. Miscellaneous Requirements

1. None