

Facility ID: 1431320434 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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

Facility ID: 1431320434 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
sheet-fed flexographic printing press with folder/gluer	OAC rule 3745-31-05(A)(3) (PTI 14-4040)	12.03 lbs of volatile organic compounds (VOC)/hour 12.5 tons per year (TPY) of VOC
	OAC rule 3745-21-09(Y)	The hourly VOC emission limitation is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this emission limitation. The VOC emission limitation established in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

B. Operational Restrictions

1. The following coating usages and individual material VOC weight percentages shall not be exceeded:

Material Pounds/Year VOC Weight %

Water based inks 226,640 9.01
Water based adhesives 89,856 5.0
Cleanup materials 10,400 1.0

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the amount, in pounds, of each ink, as applied;
 - c. the amount, in pounds, of each adhesive, as applied;
 - d. the amount, in pounds, of each cleanup material employed;
 - e. the VOC content of each ink, as applied, in percent by weight;
 - f. the VOC content of each adhesive, as applied, in percent by weight;
 - g. the VOC content of each cleanup material employed, in percent by weight; and
 - h. the total VOC emissions from all inks, adhesives and clean-up materials employed, in pounds [summation of (b x e/100%) for all inks, plus the summation of (c x f/100%) for all adhesives, plus the summation of (d x g/100%) for all cleanup materials employed].
2. The permittee shall maintain annual records of the following information for this emissions unit:
 - a. the total amount of ink, in pounds, as applied (the summation of C.1.b for all months during the calendar year);

b. the total amount of adhesive, in pounds, as applied (the summation of C.1.c for all months during the calendar year);

c. the total amount of cleanup material, in pounds, employed (the summation of C.1.d for all months during the calendar year); and

d. the total annual VOC emissions, in TPY (the summation of C.1.h for all months during the calendar year, divided by 2000).

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any monthly record showing the VOC content, in percent by weight, exceeds the applicable limitations specified in Section B of this permit. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall also submit annual reports that specify the total VOC emissions (in TPY) from this emissions unit and the total amounts of ink, adhesive, and cleanup material employed (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. U.S. EPA Methods 24 and 24A shall be used to determine the VOC content in percent by weight for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Compliance with the emission limitations in Section A.1 of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation: 12.03 lbs of VOC/hour

Applicable Compliance Method: Compliance with the hourly emission limit shall be determined by multiplying the maximum ink usage rate (lbs/hour) by the actual VOC content in weight % and dividing by 100%, plus the maximum adhesive usage rate (lbs/hour) multiplied by the VOC content in weight % and dividing by 100%, plus the maximum cleanup compound usage rate (lbs/hour) multiplied by the VOC content in weight % and dividing by 100%.

b. Emission Limitation: 12.5 TPY of VOC

Applicable Compliance Method: Compliance with the annual VOC emissions limit shall be determined by the record keeping requirements specified in Section C.2 of this permit.

c. Material Usage Limitations:

Material Pounds/Year

Water based inks 226,640
Water based adhesives 89,856
Cleanup materials 10,400

Applicable Compliance Method: Compliance with the material usage limitations shall be determined by the record keeping requirements specified in Section C.2 of this permit.

F. Miscellaneous Requirements

None